

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JUDY HOLMQUIST, an individual

Plaintiff,

v.

RESILIENCE HEALTHCARE – WEST
SUBURBAN MEDICAL CENTER, LLC a
Delaware limited liability Company,
RESILIENCE HEALTHCARE-WEISS
MEMORIAL HOSPITAL, LLC, a Delaware
limited liability Company, AUM GLOBAL
HEALTHCARE MANAGEMENT, LLC d/b/a
Resilience Healthcare, WestLaw Management
Company, LLC, a Michigan Limited Liability
Company,

Defendant(s).

Case No.

(Removed from the Circuit Court of Cook
County, Illinois, County Department,
Chancery Division – Case No. 2023CH06224)

NOTICE OF REMOVAL

Defendants Resilience Healthcare – West Suburban Medical Center, LLC (“West Suburban”), Resilience Healthcare – Weiss Memorial Hospital, LLC (“Weiss Memorial”), and AUM Global Healthcare Management, LLC d/b/a Resilience Healthcare (improperly named as AUM Global Healthcare Management, LLC d/b/a Resilience Healthcare, WestLaw Management Company, LLC) (collectively “Defendants”), hereby remove the above-captioned action, which is currently pending in the Circuit Court of Cook County, Illinois, County Department, Chancery Division, to the United States District Court for the Northern District of Illinois, Eastern Division. This removal is based upon supplemental jurisdiction under 28 U.S.C. § 1367(a). In support of their Notice of Removal, Defendants state the following:

I. THE FEDERAL AND STATE COURT ACTIONS

1. On May 5, 2023, Plaintiff Judy Holmquist (“Plaintiff”), filed a lawsuit in this Court, entitled *Judy Holmquist v. Resilience Healthcare – West Suburban Medical Center, LLC, et al.*, Case No. 23-cv-02867 (the “Federal Court Action”), alleging, *inter alia*, that Defendants violated the Family and Medical Leave Act of 1993 (“FMLA”) and Employee Retirement Income Security Act (“ERISA”) when Defendants allegedly terminated her for exercising her rights under the FMLA and ERISA.

2. On July 3, 2023, Plaintiff filed a lawsuit in the Circuit Court of Cook County, Illinois, County Department, Chancery Division, entitled *Judy Holmquist v. Resilience Healthcare – West Suburban Medical Center, LLC, et al.*, Case No. 2023CH06224 (the “State Court Action”), alleging claims of retaliatory discharge and disability discrimination in violation of the Illinois Human Rights Act (“IHRA”) against Defendants based upon the events leading up to and including her termination, all of which were alleged in the Federal Court Action.

3. West Suburban and Weiss Memorial Hospital were served with a copy of the Summons and Complaint in the State Court Action on August 2, 2023. On August 31, 2023, AUM Global agreed to accept service of the Summons and Complaint. In accordance with 28 U.S.C. § 1446(a), a true and correct copy of the Summons and Complaint served on West Suburban and Weiss Memorial Hospital are attached as **Exhibit A**. No other process, pleadings, or orders related to this Action have been served on Defendants.

4. This Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b), as it is filed within thirty (30) days of service upon West Suburban and Weiss Memorial.

II. JURISDICTION AND VENUE

5. Because the Circuit Court of Cook County, Illinois, County Department, Chancery Division lies in the Eastern Division of the Northern District of Illinois, this Court is the appropriate venue for removal. *See* 28 U.S.C. §§ 1441(a) and 1446(a).

6. Removal of the State Court Action to this Court is proper because this Court has supplemental jurisdiction over the claims in the State Court Action pursuant to 28 U.S.C. § 1367(a).

III. SUPPLEMENTAL JURISDICTION

7. This Court has federal question jurisdiction over the Federal Court Action currently before the Court, under 28 U.S.C. § 1331, which confers original jurisdiction on the federal district courts “of all civil actions arising under the Constitution, laws, or treatises of the United States.”

8. Pursuant to 28 U.S.C. § 1367(a), this Court has supplemental jurisdiction over Plaintiff’s IHRA claims alleged in the State Court Action because those claims are so related to her FMLA and ERISA claims in the Federal Court Action that they form part of the same case or controversy under Article III of the United States Constitution. *See* 28 U.S.C. § 1367(a). The critical inquiry in determining whether claims form part of the same case or controversy is whether they “derive from a common nucleus of operative facts.” *City of Chicago v. Int’l Coll. of Surgeons*, 522 U.S. 156, 164-65 (1997).

9. Plaintiff’s IHRA claims derive from a common nucleus of operative facts as her FMLA and ERISA claims because they are all founded on the same allegedly retaliatory conduct, allegedly committed by the same individuals, under the same alleged circumstances. *See, e.g., De v. City of Chicago*, 912 F. Supp. 2d 709, 732 (N.D. Ill. 2012) (concluding that the plaintiff’s state and federal claims formed part of the same case or controversy because his claims were founded

on the same conduct, committed by the same defendants, under the same conditions of employment).

10. The IHRA claims in the State Court Action provide virtually identical facts and allegations as the corresponding federal law claims, namely, FMLA and ERISA.

11. Because Plaintiff's IHRA claims "derive from a common nucleus of operative facts" and because this Court has original jurisdiction over Plaintiff's FMLA and ERISA claims, which are currently before this Court, it is similarly vested with supplemental jurisdiction over Plaintiff's State Court Action.

12. Plaintiff's use of identical factual allegations to support her Federal Court Action and State Court Action demonstrates an expectation that all of her claims will be considered in a single lawsuit. *See, e.g., Goodman v. Bd. of Trustees of Community College*, 511 F. Supp. 602, 605 (N.D. Ill. 1981).

IV. COMPLIANCE WITH PROCEDURAL REQUIREMENTS

13. In accordance with the requirements of 28 U.S.C. § 1446, which sets the deadline for filing a notice of removal to thirty (30) days after service of a Summons and Complaint, this Notice of Removal is timely filed as it is filed within 30 days of service of the Summons and Complaint on August 2, 2023.

14. A true and correct copy of this Notice of Removal has been forwarded for filing in the Circuit Court of Cook County. Attached as **Exhibit B** is a copy of the Notice to Clerk of Circuit Court of Cook County of the Filing of Notice of Removal, the original of which is being filed with the Clerk of the Circuit Court of Cook County as required by 28 U.S.C. § 1446(d).

15. Attached as **Exhibit C** is a true and correct copy of the Notice to Adverse Party of Filing of Notice of Removal, the original of which is being served on the following individuals, as

required by 28 U.S.C. § 1446(d) via U.S Mail and email: Caryn I. Shawn, Shaw Legal Services, Ltd., 540 W. Briar, Ste B, Chicago, Illinois 60657, cshaw@shawattorneys.com.

16. Defendants file this Notice of Removal solely to remove the State Court Action and do not waive, and specifically reserve, any and all defenses.

WHEREFORE, having fulfilled all statutory requirements, Defendants hereby remove Plaintiff's State Court Action from the Circuit Court of Cook County, County Department, Chancery Division to this Court and requests that the Court assume jurisdiction over Plaintiff's State Court Action.

Dated: September 1, 2023

Respectfully submitted,

/s/ Colette L. Kopon

Colette L. Kopon, ARDC# 6318262
Littler Mendelson, P.C.
321 North Clark Street, Suite 1100
Chicago, IL 60654
Telephone: 312.372.5520
ckopon@littler.com

Ariel Clarke, ARDC# 6335703
Littler Mendelson, P.C.
2425 E Camelback Road, Suite 900
Phoenix, AZ 85016
Telephone: 602.474.3600
aclarke@littler.com

Counsel for Defendants

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on September 1, 2023, she caused a copy of the foregoing to be electronically filed with the Clerk of the U.S. District Court, Northern District of Illinois, using the CM/ECF system, which sent notification via electronic mail of such filing to all attorneys of record and sent a copy via U.S. Mail and email:

Caryn I. Shaw
Shaw Legal Services, Ltd.
540 W. Briar, Ste B
Chicago, Illinois 60657
cshaw@shawattorneys.com

/s/ Colette L. Kopon

Colette L. Kopon

4874-1557-6186.1 / 119172-1000

EXHIBIT A



**SHERIFF'S OFFICE OF COOK COUNTY
AFFIDAVIT OF SERVICE**

CASE NUMBER: 2023CH06224 **SHERIFF NUMBER:** 50313621 **MULT. SER.:** 2 **DOC. TYPE:** SMMNS

DIE DATE: 08/15/2023 **RECEIVED DATE:** 07/25/2023 **FILED DATE:** 07/21/2023 **DIST:** 640

DEFENDANT: Resilience Healthcare Weiss Memorial Hospital LLC

PLAINTIFF: HOLMQUIST, JUDY

ADDRESS: 4646 N Marine

ATTORNEY: SHAW LEGAL SERVICES LTD

CITY: Chicago

ADDRESS: 4646 W BRIAR PL B

STATE: IL **ZIP CODE:** 60640

CITY: CHICAGO

ATTACHED FEE AMT:

STATE: IL **ZIP CODE:** 60657

SERVICE INFORMATION: R/A: IRENE DUMANIS

I CERTIFY THAT I SERVED THE DEFENDANT/RESPONDENT AS FOLLOWS:

(1) PERSONAL SERVICE: BY LEAVING A COPY OF THE WRIT/ORDER WITH THE DEFENDANT/RESPONDENT

☐ PERSONALLY, AND INFORMING DEFENDANT/RESPONDENT OF CONTENTS.

(2) SUBSTITUTE SERVICE: BY LEAVING A COPY OF THE SUMMONS AND COMPLAINT AT THE DEFENDANT'S USUAL PLACE OF ABODE WITH A FAMILY MEMBER OR PERSON RESIDING THERE, 13 YEARS OR OLDER, AND INFORMING

☒ THAT PERSON OF THE CONTENTS OF THE SUMMONS. ALSO, A COPY OF THE SUMMONS WAS MAILED TO THE DEFENDANT AT HIS OR HER USUAL PLACE OF ABODE ON THE 02 DAY OF August 2023.

(3) UNKNOWN OCCUPANTS: BY LEAVING A COPY OF THE SUMMONS AND COMPLAINT NAMING "UNKNOWN OCCUPANTS" WITH A PERSON OF THE AGE OF 13 OR UPWARDS OCCUPYING SAID PREMISE.

☐

(4) CORP/CO/BUS/PART: BY LEAVING THE APPROPRIATE NUMBER OF COPIES OF THE SUMMONS, COMPLAINTS, INTERROGATORIES, JUDGMENTS, CERTIFICATIONS AND NOTICES WITH THE REGISTERED AGENT, AUTHORIZED PERSON OR PARTNER OF THE DEFENDANT CORPORATION _____ COMPANY _____ BUSINESS _____ PARTNERSHIP _____

☐

(5) PROPERTY RECOVERED: NO ONE PRESENT TO RECEIVE ORDER OF COURT. ORDER POSTED IN PLAIN VIEW.

☐

(6) S.O.S/D.O.I.: BY LEAVING THE SUMMONS AND COMPLAINT WITH THE SECRETARY OF THE STATE/DIRECTOR OF INSURANCE OF THE STATE OF ILLINOIS, AN AGENT OF SAID DEFENDANT LISTED ABOVE. ANY AGENT OF SAID CORPORATION NOT FOUND IN THE COUNTY OF COOK.

☐

(7) CERTIFIED MAIL

☐

**** COMPLETE THIS SECTION IF WRIT IS A THIRD PARTY CITATION/GARNISHMENT ****

(8) AND BY MAILING ON THE _____ **DAY OF** _____ **20** _____ **A COPY OF THE THIRD PARTY GARNISHMENT/CITATION SUMMONS AND NOTICE TO THE JUDGMENT DEBTOR'S LAST KNOWN ADDRESS AS INDICATED IN THE NOTICE WITHIN (2) BUSINESS DAYS OF SERVICE UPON GARNISHEE/THIRD PARTY DEFENDANT.**

THE NAMED DEFENDANT WAS NOT SERVED FOR THE GIVEN REASON BELOW:

☐ (01) NO CONTACT

☐ (05) WRONG ADDRESS

☐ (09) DECEASED

☐ (02) MOVED

☐ (06) NO SUCH ADDRESS

☐ (10) NO REGISTERED AGENT

☐ (03) EMPTY LOT

☐ (07) EMPLOYER REFUSAL

☐ (11) OUT OF COOK COUNTY

☐ (04) NOT LISTED

☐ (08) CANCELLED BY PLAINTIFF ATTY

☐ (12) OTHER REASON (EXPLAIN)

EXPLANATION:

WRIT SERVED ON: TENNELLE JACKSON

SEX: F **RACE:** WH **AGE:** 40

THIS 02 **DAY OF** August 20 23

TIME: 9:30 AM

ATTEMPTED SERVICES

Date **Time** **Star #**

08/01/2023	10:15:00	# 11464
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THOMAS J. DART,

SHERIFF, BY: /S/ CALOMINO, SALVATORE #17007 , DEPUTY



SHERIFF'S OFFICE OF COOK COUNTY
AFFIDAVIT OF SERVICE

CASE NUMBER: 2023CH06224 SHERIFF NUMBER: 50313621 MULT. SER.: 2 DOC. TYPE: SMMNS
DIE DATE: 08/15/2023 RECEIVED DATE: 07/25/2023 FILED DATE: 07/21/2023 DIST: 640

Date	Time	Star #
08/01/2023	10:15:00	# 11464

Hearing Date: No hearing scheduled
 Location: <<CourtRoomNumber>>
 Judge: Calendar, 15



SHERIFF'S OFFICE OF COOK COUNTY
 AFFIDAVIT OF SERVICE

50313620

CASE NUMBER: 2023CH06224

MULT. SER.: 2

DOC. TYPE: SUMMONS

DIE DATE: 8/15/2023

RECEIVED DATE: 7/25/2023

FILED DATE: 7/21/2023

DIST: 302 SK

DEFENDANT: Resilience Healthcare West Suburban
 Med Ctr LLC
 3 Erie Ct
 Oak Park, IL 60302

PLAINTIFF: HOLMQUIST, JUDY
ATTORNEY: SHAW LEGAL SERVICES LTD
 540 W BRIAR PL B
 CHICAGO, IL 60657
 773-549-9500

FILED
 8/10/2023 10:36 AM
 IRIS Y. MARTINEZ
 CIRCUIT CLERK
 COOK COUNTY, IL
 2023CH06224
 Calendar, 15
 23906750

ATTACHED FEE AMT:

SERVICE INFORMATION: R/A: IRENE DUMANIS

I CERTIFY THAT I SERVED THE DEFENDANT/RESPONDENT AS FOLLOWS:

- ___ **(1) PERSONAL SERVICE:** BY LEAVING A COPY OF THE WRIT/ORDER WITH THE DEFENDANT/RESPONDENT PERSONALLY, AND INFORMING DEFENDANT/RESPONDENT OF CONTENTS.
- ___ **(2) SUBSTITUTE SERVICE:** BY LEAVING A COPY OF THE SUMMONS AND COMPLAINT AT THE DEFENDANT'S USUAL PLACE OF ABODE WITH A FAMILY MEMBER OR PERSON RESIDING THERE, 13 YEARS OR OLDER, AND INFORMING THAT PERSON OF THE CONTENTS OF THE SUMMONS. ALSO, A COPY OF THE SUMMONS WAS MAILED TO THE DEFENDANT AT HIS OR HER USUAL PLACE OF ABODE ON
- ___ **(3) UNKNOWN OCCUPANTS:** BY LEAVING A COPY OF THE SUMMONS AND COMPLAINT NAMING "UNKNOWN OCCUPANTS" WITH A PERSON OF THE AGE OF 13 OR UPWARDS OCCUPYING SAID PREMISE.
- X **(4) CORP/CO/BUS/PART:** BY LEAVING THE APPROPRIATE NUMBER OF COPIES OF THE SUMMONS, COMPLAINTS, INTERROGATORIES, JUDGMENTS, CERTIFICATIONS AND NOTICES WITH THE REGISTERED AGENT, AUTHORIZED PERSON OR PARTNER OF THE DEFENDANT CORPORATION ___ COMPANY ___ BUSINESS ___ PARTNERSHIP ___
- ___ **(5) PROPERTY RECOVERED:** NO ONE PRESENT TO RECEIVE ORDER OF COURT. ORDER POSTED IN PLAIN VIEW.
- ___ **(6) S.O.S./D.O.I.:** BY LEAVING THE SUMMONS AND COMPLAINT WITH THE SECRETARY OF THE STATE/DIRECTOR OF INSURANCE OF THE STATE OF ILLINOIS, AN AGENT OF SAID DEFENDANT LISTED ABOVE. ANY AGENT OF SAID CORPORATION NOT FOUND IN THE COUNTY OF COOK.
- ___ **(7) CERTIFIED MAIL**
- **** COMPLETE THIS SECTION IF WRIT IS A THIRD PARTY CITATION/GARNISHMENT ****
- ___ **(8) AND BY MAILING ON THE** ___ DAY OF ___ 20___ **A COPY OF THE THIRD PARTY GARNISHMENT/CITATION SUMMONS AND NOTICE TO THE JUDGMENT DEBTOR'S LAST KNOWN ADDRESS AS INDICATED IN THE NOTICE WITHIN (2) BUSINESS DAYS OF SERVICE UPON GARNISHEE/THIRD PARTY DEFENDANT.**

THE NAMED DEFENDANT WAS NOT SERVED FOR THE GIVEN REASON BELOW:

- ___ (01) NO CONTACT ___ (05) WRONG ADDRESS ___ (09) DECEASED
 ___ (02) MOVED ___ (06) NO SUCH ADDRESS ___ (10) NO REGISTERED AGENT
 ___ (03) EMPTY LOT ___ (07) EMPLOYER REFUSAL ___ (11) OUT OF COOK COUNTY
 ___ (04) NOT LISTED ___ (08) CANCELLED BY PLAINTIFF ATTY ___ (12) OTHER REASON (EXPLAIN)

EXPLANATION:

WRIT SERVED ON: JANET

SEX: Female

RACE: White

AGE: 60

THIS 2 DAY OF August 2023

TIME: 10:00:00 AM

THOMAS J. DART,

SHERIFF, BY: /S/ COVARRUBIAS, RAMIRO, Star # 11629, DEPUTY

ATTEMPTED SERVICES

DATE	TIME (AM/PM)	STAR#
	:	
	:	
	:	
	:	

CLU037F

FILED DATE: 8/10/2023 10:36 AM 2023CH06224



SHERIFF’S OFFICE OF COOK COUNTY
AFFIDAVIT OF SERVICE

50313620

CASE NUMBER: 2023CH06224

DEFENDANT:	Resilience Healthcare West Suburban Med Ctr LLC	PLAINTIFF:	HOLMQUIST, JUDY
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DATE	DEPUTY	STAR #
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FILED DATE: 8/10/2023 10:36 AM 2023CH06224

Hearing Date: No hearing scheduled
 Location: <<CourtRoomNumber>>
 Judge: Calendar 15



SHERIFF'S OFFICE OF COOK COUNTY
 AFFIDAVIT OF SERVICE

FILED
 8/10/2023 10:38 AM
 IRIS Y. MARTINEZ
 CIRCUIT CLERK
 COOK COUNTY, IL
 2023CH06224
 DIST-640 SK
 Calendar, 15
 23906750

CASE NUMBER: 2023CH06224

MULT. SER.: 2

DOC. TYPE: SUMMONS

DIE DATE: 8/15/2023

RECEIVED DATE: 7/25/2023

FILED DATE: 7/21/2023

DIST-640 SK

DEFENDANT: Resilience Healthcare Weiss Memorial
 Hospital LLC
 4646 N Marine Dr
 Chicago, IL 60640

PLAINTIFF: HOLMQUIST, JUDY
ATTORNEY: SHAW LEGAL SERVICES LTD
 540 W BRIAR PL B
 CHICAGO, IL 60657
 773-549-9500

ATTACHED FEE AMT:

SERVICE INFORMATION: R/A: IRENE DUMANIS

I CERTIFY THAT I SERVED THE DEFENDANT/RESPONDENT AS FOLLOWS:

- ___ **(1) PERSONAL SERVICE:** BY LEAVING A COPY OF THE WRIT/ORDER WITH THE DEFENDANT/RESPONDENT PERSONALLY, AND INFORMING DEFENDANT/RESPONDENT OF CONTENTS.
- X **(2) SUBSTITUTE SERVICE:** BY LEAVING A COPY OF THE SUMMONS AND COMPLAINT AT THE DEFENDANT'S USUAL PLACE OF ABODE WITH A FAMILY MEMBER OR PERSON RESIDING THERE, 13 YEARS OR OLDER, AND INFORMING THAT PERSON OF THE CONTENTS OF THE SUMMONS. ALSO, A COPY OF THE SUMMONS WAS MAILED TO THE DEFENDANT AT HIS OR HER USUAL PLACE OF ABODE ON THIS 2 DAY OF August 2023
- ___ **(3) UNKNOWN OCCUPANTS:** BY LEAVING A COPY OF THE SUMMONS AND COMPLAINT NAMING "UNKNOWN OCCUPANTS" WITH A PERSON OF THE AGE OF 13 OR UPWARDS OCCUPYING SAID PREMISE.
- ___ **(4) CORP/CO/BUS/PART:** BY LEAVING THE APPROPRIATE NUMBER OF COPIES OF THE SUMMONS, COMPLAINTS, INTERROGATORIES, JUDGMENTS, CERTIFICATIONS AND NOTICES WITH THE REGISTERED AGENT, AUTHORIZED PERSON OR PARTNER OF THE DEFENDANT CORPORATION ___ COMPANY ___ BUSINESS ___ PARTNERSHIP ___
- ___ **(5) PROPERTY RECOVERED:** NO ONE PRESENT TO RECEIVE ORDER OF COURT. ORDER POSTED IN PLAIN VIEW.
- ___ **(6) S.O.S./D.O.I.:** BY LEAVING THE SUMMONS AND COMPLAINT WITH THE SECRETARY OF THE STATE/DIRECTOR OF INSURANCE OF THE STATE OF ILLINOIS, AN AGENT OF SAID DEFENDANT LISTED ABOVE. ANY AGENT OF SAID CORPORATION NOT FOUND IN THE COUNTY OF COOK.
- ___ **(7) CERTIFIED MAIL**
- **** COMPLETE THIS SECTION IF WRIT IS A THIRD PARTY CITATION/GARNISHMENT ****
- ___ **(8) AND BY MAILING ON THE** ___ **DAY OF** ___ **20** ___ **A COPY OF THE THIRD PARTY GARNISHMENT/CITATION SUMMONS AND NOTICE TO THE JUDGMENT DEBTOR'S LAST KNOWN ADDRESS AS INDICATED IN THE NOTICE WITHIN (2) BUSINESS DAYS OF SERVICE UPON GARNISHEE/THIRD PARTY DEFENDANT.**

THE NAMED DEFENDANT WAS NOT SERVED FOR THE GIVEN REASON BELOW:

- | | | |
|---------------------|--------------------------------------|---------------------------------|
| ___ (01) NO CONTACT | ___ (05) WRONG ADDRESS | ___ (09) DECEASED |
| ___ (02) MOVED | ___ (06) NO SUCH ADDRESS | ___ (10) NO REGISTERED AGENT |
| ___ (03) EMPTY LOT | ___ (07) EMPLOYER REFUSAL | ___ (11) OUT OF COOK COUNTY |
| ___ (04) NOT LISTED | ___ (08) CANCELLED BY PLAINTIFF ATTY | ___ (12) OTHER REASON (EXPLAIN) |

EXPLANATION:

WRIT SERVED ON: TENNELLE JACKSON

SEX: Female

RACE: White

AGE: 40

THIS 2 DAY OF August 2023

TIME: 12/31/1899 9:30:00 AM

ATTEMPTED SERVICES

DATE	TIME (AM/PM)	STAR#
8/1/2023	10:15:00 AM	11464
	:	
	:	
	:	

THOMAS J. DART,

SHERIFF, BY: /S/ CALOMINO, SALVATORE, Star # 17007, DEPUTY

CLU037F

FILED DATE: 8/10/2023 10:36 AM 2023CH06224



SHERIFF’S OFFICE OF COOK COUNTY
AFFIDAVIT OF SERVICE

50313621

CASE NUMBER: 2023CH06224

DEFENDANT: Resilience Healthcare Weiss Memorial
Hospital LLC **PLAINTIFF:** HOLMQUIST, JUDY

DATE	DEPUTY	STAR #
8/1/2023 10:15:00 AM not at work today	JONES, ANTHONY	11464

FILED DATE: 8/10/2023 10:36 AM 2023CH06224



**SHERIFF'S OFFICE OF COOK COUNTY
AFFIDAVIT OF SERVICE**

CASE NUMBER: 2023CH06224 **SHERIFF NUMBER:** 50313620 **MULT. SER.:** 2 **DOC. TYPE:** SMMNS

DIE DATE: 08/15/2023 **RECEIVED DATE:** 07/25/2023 **FILED DATE:** 07/21/2023 **DIST:** 302

DEFENDANT: Resilience Healthcare West Suburban Med Ctr LLC **PLAINTIFF:** HOLMQUIST, JUDY
ADDRESS: 3 Erie **ATTORNEY:** SHAW LEGAL SERVICES LTD
CITY: Oak Park **ADDRESS:** 3 W BRIAR PL B
STATE: IL **ZIP CODE:** 60302 **CITY:** CHICAGO
ATTACHED FEE AMT: **STATE:** IL **ZIP CODE:** 60657
SERVICE INFORMATION: R/A: IRENE DUMANIS

I CERTIFY THAT I SERVED THE DEFENDANT/RESPONDENT AS FOLLOWS:

- ☐ **(1) PERSONAL SERVICE:** BY LEAVING A COPY OF THE WRIT/ORDER WITH THE DEFENDANT/RESPONDENT PERSONALLY, AND INFORMING DEFENDANT/RESPONDENT OF CONTENTS.
- ☐ **(2) SUBSTITUTE SERVICE:** BY LEAVING A COPY OF THE SUMMONS AND COMPLAINT AT THE DEFENDANT'S USUAL PLACE OF ABODE WITH A FAMILY MEMBER OR PERSON RESIDING THERE, 13 YEARS OR OLDER, AND INFORMING THAT PERSON OF THE CONTENTS OF THE SUMMONS. ALSO, A COPY OF THE SUMMONS WAS MAILED TO THE DEFENDANT AT HIS OR HER USUAL PLACE OF ABODE ON THE DAY OF 20.
- ☐ **(3) UNKNOWN OCCUPANTS:** BY LEAVING A COPY OF THE SUMMONS AND COMPLAINT NAMING "UNKNOWN OCCUPANTS" WITH A PERSON OF THE AGE OF 13 OR UPWARDS OCCUPYING SAID PREMISE.
- ☒ **(4) CORP/CO/BUS/PART:** BY LEAVING THE APPROPRIATE NUMBER OF COPIES OF THE SUMMONS, COMPLAINTS, INTERROGATORIES, JUDGMENTS, CERTIFICATIONS AND NOTICES WITH THE REGISTERED AGENT, AUTHORIZED PERSON OR PARTNER OF THE DEFENDANT CORPORATION COMPANY BUSINESS PARTNERSHIP
- ☐ **(5) PROPERTY RECOVERED:** NO ONE PRESENT TO RECEIVE ORDER OF COURT. ORDER POSTED IN PLAIN VIEW.
- ☐ **(6) S.O.S/D.O.I.:** BY LEAVING THE SUMMONS AND COMPLAINT WITH THE SECRETARY OF THE STATE/DIRECTOR OF INSURANCE OF THE STATE OF ILLINOIS, AN AGENT OF SAID DEFENDANT LISTED ABOVE. ANY AGENT OF SAID CORPORATION NOT FOUND IN THE COUNTY OF COOK.
- ☐ **(7) CERTIFIED MAIL**
- **** COMPLETE THIS SECTION IF WRIT IS A THIRD PARTY CITATION/GARNISHMENT ******
- ☐ **(8) AND BY MAILING ON THE** **DAY OF** **20** **A COPY OF THE THIRD PARTY GARNISHMENT/CITATION SUMMONS AND NOTICE TO THE JUDGMENT DEBTOR'S LAST KNOWN ADDRESS AS INDICATED IN THE NOTICE WITHIN (2) BUSINESS DAYS OF SERVICE UPON GARNISHEE/THIRD PARTY DEFENDANT.**

THE NAMED DEFENDANT WAS NOT SERVED FOR THE GIVEN REASON BELOW:

- | | | |
|--|---|--|
| <input type="checkbox"/> (01) NO CONTACT | <input type="checkbox"/> (05) WRONG ADDRESS | <input type="checkbox"/> (09) DECEASED |
| <input type="checkbox"/> (02) MOVED | <input type="checkbox"/> (06) NO SUCH ADDRESS | <input type="checkbox"/> (10) NO REGISTERED AGENT |
| <input type="checkbox"/> (03) EMPTY LOT | <input type="checkbox"/> (07) EMPLOYER REFUSAL | <input type="checkbox"/> (11) OUT OF COOK COUNTY |
| <input type="checkbox"/> (04) NOT LISTED | <input type="checkbox"/> (08) CANCELLED BY PLAINTIFF ATTY | <input type="checkbox"/> (12) OTHER REASON (EXPLAIN) |

EXPLANATION:

WRIT SERVED ON: JANET
 SEX: F RACE: WH AGE: 60
 THIS 02 DAY OF August 20 23
 TIME: 10:00 AM

ATTEMPTED SERVICES

Date	Time	Star #
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THOMAS J. DART,
 SHERIFF, BY: /S/ COVARRUBIAS, RAMIRO #11629 , DEPUTY



SHERIFF'S OFFICE OF COOK COUNTY
AFFIDAVIT OF SERVICE

CASE NUMBER: 2023CH06224 SHERIFF NUMBER: 50313620 MULT. SER.: 2 DOC. TYPE: SMMNS
DIE DATE: 08/15/2023 RECEIVED DATE: 07/25/2023 FILED DATE: 07/21/2023 DIST: 302

Date

Time

Star #

This form is approved by the Illinois Supreme Court and must be accepted in all Illinois Courts.
Forms are free at ilcourts.info/forms.

STATE OF ILLINOIS, CIRCUIT COURT <u>Cook</u> COUNTY		SUMMONS		<i>For Court Use Only</i> FILED 7/21/2023 3:27 PM IRIS Y. MARTINEZ CIRCUIT CLERK COOK COUNTY, IL 2023CH06224 Calendar, 15 23643204
Instructions ▼ Enter above the county name where the case was filed.	<u>Judy Holmquist</u> Plaintiff / Petitioner (First, middle, last name)			2023CH06224 Case Number Hearing Date: No hearing scheduled Location: <<CourtRoomNumber>> Judge: Calendar, 15
Enter your name as Plaintiff/Petitioner.	v.			
Below "Defendants/ Respondents," enter the names of all people you are suing.	Defendants / Respondents (First, middle, last name) <u>Resilience Healthcare-West Suburban Medical Center, LLC, Resilience Healthcare-Weiss Memorial Hospital, LLC and AUM Global Healthcare Mgmt, LLC dba Resilience Healthcare-WestLaw Mgmt Company, LLC</u>			
Enter the Case Number given by the Circuit Clerk.	<input type="checkbox"/> Alias Summons (Check this box if this is not the 1 st Summons issued for this Defendant.)			

IMPORTANT: You have been sued.

- Read all documents attached to this Summons.
- You **MUST** file an official document with the court within the time stated on this Summons called an *Appearance* and a document called an *Answer/Response*. If you do not file an *Appearance* and *Answer/Response* on time, the judge may decide the case without hearing from you. This is called "default." As a result, you could lose the case.
- All documents referred to in this Summons can be found at ilcourts.info/forms. Other documents may be available from your local Circuit Court Clerk's office or website.
- After you fill out the necessary documents, you need to electronically file (e-file) them with the court. To e-file, you must create an account with an e-filing service provider. For more information, go to ilcourts.info/efiling. If you cannot e-file, you can get an exemption that allows you to file in-person or by mail.
- You may be charged filing fees, but if you cannot pay them, you can file an Application for Waiver of Court Fees.
- It is possible that the court will allow you to attend the first court date in this case in-person or remotely by video or phone. Contact the Circuit Court Clerk's office or visit the Court's website to find out whether this is possible and, if so, how to do this.
- Need help? Call or text Illinois Court Help at 833-411-1121 or go to ilcourthelp.gov for information about going to court, including how to fill out and file documents. You can also get free legal information and legal referrals at illinoislegalaid.org. All documents referred to in this Summons can be found at ilcourts.info/forms. Other documents may be available from your local Circuit Court Clerk's office or website.
- ¿Necesita ayuda? Llame o envíe un mensaje de texto a Illinois Court Help al 833-411-1121, o visite ilcourthelp.gov para obtener información sobre los casos de la corte y cómo completar y presentar formularios.

Plaintiff/Petitioner:

Do not use this form in these types of cases:

- | | | |
|----------------------|------------------------------|-------------------------------|
| • All criminal cases | • Order of protection | • Adult guardianship |
| • Eviction | • Paternity | • Detinue |
| • Small Claims | • Stalking no contact orders | • Foreclosure |
| • Divorce | • Civil no contact orders | • Administrative review cases |

For eviction, small claims, divorce, and orders of protection, use the forms available at ilcourts.info/forms. If your case is a detinue, visit illinoislegalaid.org for help.

If you are suing more than 1 Defendant/Respondent, attach an *Additional Defendant/Respondent Address and Service Information* form for **each** additional Defendant/Respondent.

In 1a, enter the name and address of the first Defendant/ Respondent you are serving. If you are serving a Registered Agent, include the Registered Agent's name and address here.

In 1b, enter a second address for the first Defendant/ Respondent, if you have one.

In 1c, check how you are sending your documents to this Defendant/ Respondent.

1. Defendant/Respondent's address and service information:

a. Defendant/Respondent's primary address/information for service:

Name (First, Middle, Last): Resilience Healthcare-West Suburban Medical Center, LLC

Registered Agent's name, if any: Irene Dumanis

Street Address, Unit #: 3 Erie Court

City, State, ZIP: Oak Park, IL 60302

Telephone: _____ Email: _____

b. If you have more than one address where Defendant/Respondent might be found, list that here:

Name (First, Middle, Last): _____

Street Address, Unit #: _____

City, State, ZIP: _____

Telephone: _____ Email: _____

c. Method of service on Defendant/Respondent:

☒ Sheriff

☐ Sheriff outside Illinois: _____

County & State

☐ Special process server

☐ Licensed private detective

☒ **I am serving more than 1 Defendant/Respondent.**

I have attached 2 Additional Defendant/Respondent Address and Service Information forms.

2. Information about the lawsuit:

a. Amount claimed: \$ 200,000.00

☐ **b. I am asking for the return of tangible personal property (items in the Defendant/Respondent's possession).**

3. Contact information for the Plaintiff/Petitioner:

Name (First, Middle, Last): Shaw Legal Services Ltd

Street Address, Unit #: 540 West Briar Place, Suite B

City, State, ZIP: Chicago, IL 60657

Telephone: (773) 549-9500 Email: administrator@shawattorneys.com

GETTING COURT DOCUMENTS BY EMAIL: You should use an email account that you do not share with anyone else and that you check every day. If you do not check your email every day, you may miss important information, notice of court dates, or documents from other parties.

Important information for the person getting this form

You have been sued. Read all of the documents attached to this *Summons*. To participate in the case, you must follow the instructions listed below. If you do not, the court may decide the case without hearing from you and you could lose the case. *Appearance* and *Answer/Response* forms can be found at: ilcourts.info/forms.

Check 4a or 4b. If Defendant/Respondent only needs to file an *Appearance* and *Answer/Response* within 30 days, check box 4a. Otherwise, if the clerk gives you a court date, check box 4b.

4. Instructions for person receiving this *Summons* (Defendant):

☐ **a. To respond to this *Summons*, you must file *Appearance* and *Answer/Response* forms with the court within 30 days after you have been served (not counting the day of service) by e-filing or at:**

Address: _____

City, State, ZIP: _____

FILED DATE: 7/21/2023 3:27 PM 2023CH06224

In 4a, fill out the address of the court building where the Defendant may file or e-file their Appearance and Answer/ Response.

In 4b, fill out:

- The court date and time the clerk gave you.
 - The courtroom and address of the court building.
 - The call-in or video information for remote appearances (if applicable).
 - The clerk's phone number and website.
- All of this information is available from the Circuit Clerk.



b. Attend court:

On: 11/02/2023 at 10:00 ☒ a.m. ☐ p.m. in 2410
Date Time Courtroom

In-person at:

Courthouse Address City State ZIP

OR

Remotely (You may be able to attend this court date by phone or video conference.)

This is called a "Remote Appearance"):

By telephone: 312-626-6799
Call-in number for telephone remote appearance

By video conference: https://circuitcourtofcookcounty.zoom.us/j/95535573920
Video conference website

Meeting ID: 95535573920 no password required
Video conference log-in information (meeting ID, password, etc.)

Call the Circuit Clerk at: (312) 603-5030 or visit their website
Circuit Clerk's phone number

at: https://www.cookcountyclerkofcourt.org to find out more about how to do this.
Website

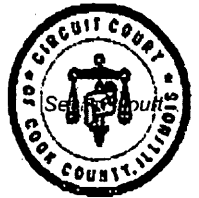
STOP!

The Circuit Clerk will fill in this section.

Witness this Date:

7/21/2023 3:27 PM IRIS Y. MARTINEZ

Clerk of the Court:



STOP! The officer or process server will fill in the Date of Service

Note to officer or process server:

- If 4a is checked, this *Summons* must be served within 30 days of the witness date.
- If 4b is checked, this *Summons* must be served at least 21 days before the court date, unless 2b is also checked.
 - If 4b and 2b are checked, the *Summons* must be served at least 3 days before the court date.

Date of Service:

(Date to be entered by an officer or process server on the copy of this Summons left with the Defendant or other person.)

****Stop. Do not complete the form. The sheriff or special process server will fill in the form. Give them one copy of this blank *Proof of Service* form for each Defendant/Respondent.****

First, Middle, Last

- Address: _____
City, State, ZIP: _____

☐ I was not able to serve the *Summons* and Complaint/Petition on Defendant/Respondent:

First, Middle, Last

I made the following attempts to serve the *Summons* and Complaint/Petition on the Defendant/Respondent:

1. On this date: _____ at this time: _____ ☐ a.m. ☐ p.m.
Address: _____
City, State, ZIP: _____
Other information about service attempt: _____

2. On this date: _____ at this time: _____ ☐ a.m. ☐ p.m.
Address: _____
City, State, ZIP: _____
Other information about service attempt: _____

3. On this date: _____ at this time: _____ ☐ a.m. ☐ p.m.
Address: _____
City, State, ZIP: _____
Other information about service attempt: _____

DO NOT complete this section. The sheriff or private process server will complete it.

If you are a special process server, sheriff outside Illinois, or licensed private detective, your signature certifies that everything on the *Proof of Service of Summons* is true and correct to the best of your knowledge. You understand that making a false statement on this form could be perjury.

Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony.

By:

Signature by: ☐ Sheriff
☐ Sheriff outside Illinois:

County and State
☐ Special process server
☐ Licensed private detective

FEES

Service and Return:	\$
Miles	\$
Total	\$ 0.00

Print Name

If *Summons* is served by licensed private detective or private detective agency:

License Number: _____

**STATE OF ILLINOIS,
CIRCUIT COURT**

**ADDITIONAL
DEFENDANT/RESPONDENT
ADDRESS AND SERVICE
INFORMATION FOR SUMMONS**

Instructions

Plaintiff / Petitioner *(First, middle, last name)*

v.

Defendants / Respondents (*First, middle, last name*)

2023CH06224

LLC, Resilience Healthcare-Weiss Memorial Hosptial, LLC

and AUM Global Healthcare Management, LLC dba

Resilience Healthcare-WestLaw Management Company, LLC

Case Number

1. Next Defendant/Respondent's address and service information:

a. Defendant/Respondent's primary address/information for service:

Name (First, Middle, Last): AUM Global Healthcare Management, LLC

Registered Agent's name, if any: M. Kumar

Street Address, Unit #: 191 South Berkshire Road

City, State, ZIP: Bloomfield Hills, MI 48302

Telephone: _____ Email: _____

b. If you have more than one address where Defendant/Respondent might be found, list that here:

Name (First, Middle, Last):

Street Address, Unit #:

City, State, ZIP:


Telephone: Email:

c. Method of service on Defendant/Respondent:

☐ Sheriff ☒ Sheriff outside Illinois: Oakland County Michigan
County & State

☐ Special process server☐ Licensed private detective

(05/23)

STATE OF ILLINOIS, CIRCUIT COURT		ADDITIONAL DEFENDANT/RESPONDENT ADDRESS AND SERVICE INFORMATION FOR SUMMONS		<i>For Court Use Only</i>
Cook  COUNTY				
Instructions				
Enter above the county name where the case was filed.				
Enter your name as Plaintiff/Petitioner.				
Below "Defendants/ Respondents," enter the names of all people you are suing.				
Enter the Case Number given by the Circuit Clerk.	<p>Plaintiff / Petitioner <i>(First, middle, last name)</i></p> <p><u>Judy Holmquist</u></p> <p>v.</p> <p>Defendants / Respondents <i>(First, middle, last name)</i></p> <p><u>Resilience Healthcare-West Suburban Medical Center,</u></p> <p><u>LLC, Resilience Healthcare-Weiss Memorial Hospital, LLC</u></p> <p><u>and AUM Global Healthcare Management, LLC dba</u></p> <p><u>Resilience Healthcare-WestLaw Management Company, LLC</u></p> <p><input type="checkbox"/> Alias Summons <i>(Check this box if this is not the 1st Summons issued for this Defendant.)</i></p>			<p><u>2023CH06224</u></p> <p>Case Number</p>

In 1c, check how you are sending your documents to this Defendant/Respondent.

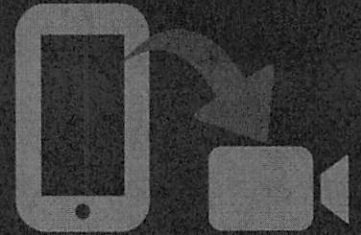
c. Method of service on Defendant/Respondent:

☒ Sheriff ☐ Sheriff outside Illinois: _____
County & State

☐ Special process server ☐ Licensed private detective

ZOOM FROM YOUR PHONE

How to use Zoom on your smart phone
for your remote court hearing



FILED DATE: 7/21/2023 3:27 PM 2023CH0622

1

GO TO YOUR APP STORE

On iPhones, it is called the App Store. On Androids, it is called Google Play. If the court gave you a link, click the link and follow the instructions.



Google Play

2

DOWNLOAD THE ZOOM APP

Search for the Zoom Cloud Meetings app in the search bar and download the FREE app called "ZOOM Cloud Meetings."



ZOOM Cloud Meetings
Meet Happy
★★★★★ 965K



3

OPEN THE ZOOM APP

You can open the Zoom app immediately after downloading it by clicking the "Open" button in your App Store or you can open the Zoom app that is now on your phone.

OPEN



4

CLICK "JOIN A MEETING"

You do not need to "Sign Up" or "Sign In" to join a meeting.

Join a Meeting

5

TYPE YOUR INFORMATION AND CLICK "JOIN"

Type in the Meeting ID the court gives you in the box labeled A.
Type in your full name in the box labeled B.

Cancel Join a Meeting

Meeting ID **A**

Join with a personal link name

Screen Name **B**

Join

6

TYPE THE ZOOM MEETING PASSWORD

Type in the Zoom Meeting Password the court gives you in the box labeled C and click "Continue."

Please enter your meeting password

Password **C**

Cancel Continue

7

CLICK "JOIN WITH VIDEO"

You will be automatically asked to connect to video. If you are not asked, look for the camera symbol and click "Start Video."

Join with Video

8

CLICK "JOIN AUDIO" AND CHOOSE "CALL OVER INTERNET" OR "DIAL IN"

You will be automatically asked to connect to audio. If you are not asked, look for the headphones symbol, click "Join Audio," and select "Call Over Internet." "Dial in" requires the phone number the court gives you.

Join Audio Start Video Screen Controls Participants More

To hear others please join audio

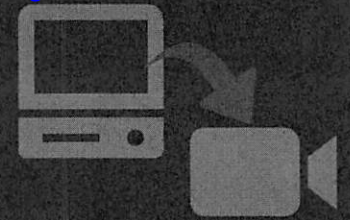
Call Over Internet

Dial in

Cancel

ZOOM FROM YOUR COMPUTER

How to use Zoom on your computer or laptop (with a webcam) for your remote court hearing



FILED DATE: 7/21/2023 3:27 PM 2023CH0622

1

GO TO zoom.us/join

If the court gave you a link, click the link and follow the instructions.



2

TYPE YOUR INFORMATION AND CLICK "JOIN"

Type in the Meeting ID the court gives you in the box labeled A and click "Join."

Join a Meeting

Meeting ID or Personal Link Name **A**

Join

3

CLICK "OPEN ZOOM MEETINGS"

If you don't have Zoom installed on your computer, click on "download and run Zoom" and open the .exe file to install Zoom.

Open Zoom Meetings?

<https://zoom.us> wants to open this application.

☐ Always allow zoom.us to open links of this type in the associated app.

Open Zoom Meetings Cancel

4

TYPE YOUR INFORMATION AND CLICK "JOIN"

Type in the Meeting ID the court gives you in the box labeled B. Type in your full name in the box labeled C.

Join Meeting

Meeting ID or Personal Link Name **B**

Your Name **C**

☐ Remember my name for future meetings

☐ Don't connect to audio

☐ Turn off my video

Cancel Join

5

TYPE THE ZOOM MEETING PASSWORD

Type in the Zoom Meeting Password the court gives you in the box labeled D and click "Join Meeting."

Enter meeting password

Meeting password **D**

Join Meeting Cancel

6

CLICK "JOIN WITH VIDEO"

You will see a video preview before you join with video. If you do not want to appear with video, click "Join without Video."

Join without Video Join with Video

7

CLICK "JOIN WITH COMPUTER AUDIO"

You can test your speaker and microphone by clicking the words under "Join with Computer Audio."

Choose ONE of the audio conference options

Phone Call Computer Audio

Join with Computer Audio

Test Speaker and Microphone

Getting Ready for Your Remote Hearing:

- Check your internet or phone connection.
- Charge your computer or phone. Make sure you have enough minutes.
- Use earbuds or headphones if you can. This makes it easier to hear you speak.
- Look for the microphone symbol to mute and un-mute yourself.
- Keep yourself on mute when your case is not before the judge.
- Use an empty, quiet space where no one will interrupt you and with no background noise.
- Set the camera at eye level. If using a phone, prop it up so your hands are free.
- Pause before speaking in case there is audio/video lag.
- Even if you are at home, remember that a remote hearing is still an official court hearing and you should dress and behave appropriately.

This form is approved by the Illinois Supreme Court and must be accepted in all Illinois Courts.
Forms are free at ilcourts.info/forms.

STATE OF ILLINOIS, CIRCUIT COURT <u>Cook</u> COUNTY		SUMMONS	<i>For Court Use Only</i> FILED 7/21/2023 3:27 PM IRIS Y. MARTINEZ CIRCUIT CLERK COOK COUNTY, IL 2023CH06224 Calendar, 15 23643204
Instructions ▼ Enter above the county name where the case was filed. Enter your name as Plaintiff/Petitioner. Below "Defendants/ Respondents," enter the names of all people you are suing. Enter the Case Number given by the Circuit Clerk.	Judy Holmquist Plaintiff / Petitioner (<i>First, middle, last name</i>) v. Defendants / Respondents (<i>First, middle, last name</i>) <u>Resilience Healthcare-West Suburban Medical Center, LLC, Resilience Healthcare-Weiss Memorial Hospital, LLC and AUM Global Healthcare Management, LLC dba Resilience Healthcare-WestLaw Management Company, LLC</u> <input type="checkbox"/> Alias Summons (<i>Check this box if this is not the 1st Summons issued for this Defendant.</i>)		2023CH06224 Case Number Hearing Date: No hearing scheduled Location: <<CourtRoomNumber>> Judge: Calendar, 15

IMPORTANT: You have been sued.

- Read all documents attached to this Summons.
- You **MUST** file an official document with the court within the time stated on this Summons called an *Appearance* and a document called an *Answer/Response*. If you do not file an *Appearance* and *Answer/Response* on time, the judge may decide the case without hearing from you. This is called "default." As a result, you could lose the case.
- All documents referred to in this Summons can be found at ilcourts.info/forms. Other documents may be available from your local Circuit Court Clerk's office or website.
- After you fill out the necessary documents, you need to electronically file (e-file) them with the court. To e-file, you must create an account with an e-filing service provider. For more information, go to ilcourts.info/efiling. If you cannot e-file, you can get an exemption that allows you to file in-person or by mail.
- You may be charged filing fees, but if you cannot pay them, you can file an Application for Waiver of Court Fees.
- It is possible that the court will allow you to attend the first court date in this case in-person or remotely by video or phone. Contact the Circuit Court Clerk's office or visit the Court's website to find out whether this is possible and, if so, how to do this.
- Need help? Call or text Illinois Court Help at 833-411-1121 or go to ilcourthelp.gov for information about going to court, including how to fill out and file documents. You can also get free legal information and legal referrals at illinoislegalaid.org. All documents referred to in this Summons can be found at ilcourts.info/forms. Other documents may be available from your local Circuit Court Clerk's office or website.
- ¿Necesita ayuda? Llame o envíe un mensaje de texto a Illinois Court Help al 833-411-1121, o visite ilcourthelp.gov para obtener información sobre los casos de la corte y cómo completar y presentar formularios.

Plaintiff/Petitioner:

Do not use this form in these types of cases:

- | | | |
|----------------------|------------------------------|-------------------------------|
| • All criminal cases | • Order of protection | • Adult guardianship |
| • Eviction | • Paternity | • Detinue |
| • Small Claims | • Stalking no contact orders | • Foreclosure |
| • Divorce | • Civil no contact orders | • Administrative review cases |

For eviction, small claims, divorce, and orders of protection, use the forms available at ilcourts.info/forms. If your case is a detinue, visit illinoislegalaid.org for help.

If you are suing more than 1 Defendant/Respondent, attach an *Additional Defendant/Respondent Address and Service Information* form for **each** additional Defendant/Respondent.

In 1a, enter the name and address of the first Defendant/ Respondent you are serving. If you are serving a Registered Agent, include the Registered Agent's name and address here.

In 1b, enter a second address for the first Defendant/ Respondent, if you have one.

In 1c, check how you are sending your documents to this Defendant/ Respondent.

1. Defendant/Respondent's address and service information:

a. Defendant/Respondent's primary address/information for service:

Name (First, Middle, Last): Resilience Healthcare-Weiss Memorial Hospital, LLC

Registered Agent's name, if any: Irene Dumanis

Street Address, Unit #: 4646 North Marine Drive

City, State, ZIP: Chicago, IL 60640

Telephone: _____ Email: _____

b. If you have more than one address where Defendant/Respondent might be found, list that here:

Name (First, Middle, Last): _____

Street Address, Unit #: _____

City, State, ZIP: _____

Telephone: _____ Email: _____

c. Method of service on Defendant/Respondent:

☒ Sheriff ☐ Sheriff outside Illinois: _____

County & State

☐ Special process server

☐ Licensed private detective

☒ **I am serving more than 1 Defendant/Respondent.**

I have attached 2 Additional Defendant/Respondent Address and Service Information forms.

2. Information about the lawsuit:

a. Amount claimed: \$ 200,000.00

☐ b. I am asking for the return of tangible personal property (items in the Defendant/Respondent's possession).

3. Contact information for the Plaintiff/Petitioner:

Name (First, Middle, Last): Shaw Legal Services Ltd

Street Address, Unit #: 540 West Briar Place, Suite B

City, State, ZIP: Chicago, IL 60657

Telephone: (773) 549-9500 Email: administrator@shawattorneys.com

GETTING COURT DOCUMENTS BY EMAIL: You should use an email account that you do not share with anyone else and that you check every day. If you do not check your email every day, you may miss important information, notice of court dates, or documents from other parties.

Important information for the person getting this form

You have been sued. Read all of the documents attached to this *Summons*. To participate in the case, you must follow the instructions listed below. If you do not, the court may decide the case without hearing from you and you could lose the case. *Appearance* and *Answer/Response* forms can be found at: ilcourts.info/forms.

Check 4a or 4b. If Defendant/Respondent only needs to file an *Appearance* and *Answer/Response* within 30 days, check box 4a. Otherwise, if the clerk gives you a court date, check box 4b.

4. Instructions for person receiving this *Summons* (Defendant):

☐ a. To respond to this *Summons*, you must file *Appearance* and *Answer/Response* forms with the court within 30 days after you have been served (not counting the day of service) by e-filing or at:

Address: _____

City, State, ZIP: _____

In 4b, fill out:

- The court date and time the clerk gave you.
 - The courtroom and address of the court building.
 - The call-in or video information for remote appearances (if applicable).
 - The clerk's phone number and website.
- All of this information is available from the Circuit Clerk.

On: 11/02/2023 at 10:00 ☒ a.m. ☐ p.m. in 2410
Date Time Courtroom

<i>Courthouse Address</i>	<i>City</i>	<i>State</i>	<i>ZIP</i>
---------------------------	-------------	--------------	------------

Remotely (You may be able to attend this court date by phone or video conference.)

This is called a "Remote Appearance"):

By telephone: 312-626-6799
Call-in number for telephone remote appearance

By video conference: <https://circuitcourtofcookcounty.zoom.us/j/95535573920>
Video conference website

Meeting ID: 95535573920 no password required
Video conference log-in information (meeting ID, password, etc.)

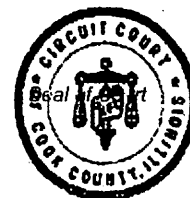
Call the Circuit Clerk at: (312) 603-5030 or visit their website
Circuit Clerk's phone number

at: <https://www.cookcountyclerkofcourt.org> to find out more about how to do this.
Website

The Circuit Clerk will fill in this section.

Witness this Date: 7/21/2023 3:27 PM IRIS Y. MARTINEZ

Clerk of the Court:



STOP! The officer or process server will fill in the Date of Service

Note to officer or process server:

- If 4a is checked, this *Summons* must be served within 30 days of the witness date.
- If 4b is checked, this *Summons* must be served at least 21 days before the court date, unless 2b is also checked.
 - If 4b and 2b are checked, the *Summons* must be served at least 3 days before the court date.

Date of Service: _____
(Date to be entered by an officer or process server on the copy of this Summons left with the Defendant or other person.)

**This form is approved by the Illinois Supreme Court and must be accepted in all Illinois Courts.
Forms are free at ilcourts.info/forms.**

****Stop. Do not complete the form. The sheriff or special process server will fill in the form. Give them one copy of this blank *Proof of Service* form for each Defendant/Respondent.****

City, State, ZIP: _____

☐ I was not able to serve the *Summons* and Complaint/Petition on Defendant/Respondent:

First, Middle, Last

I made the following attempts to serve the *Summons* and Complaint/Petition on the Defendant/Respondent:

1. On this date: _____ at this time: _____ ☐ a.m. ☐ p.m.
Address: _____
City, State, ZIP: _____
Other information about service attempt: _____

2. On this date: _____ at this time: _____ ☐ a.m. ☐ p.m.
Address: _____
City, State, ZIP: _____
Other information about service attempt: _____

3. On this date: _____ at this time: _____ ☐ a.m. ☐ p.m.
Address: _____
City, State, ZIP: _____
Other information about service attempt: _____

DO NOT complete this section. The sheriff or private process server will complete it.

If you are a special process server, sheriff outside Illinois, or licensed private detective, your signature certifies that everything on the *Proof of Service of Summons* is true and correct to the best of your knowledge. You understand that making a false statement on this form could be perjury.

Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony.

By:

Signature by: ☐ Sheriff
☐ Sheriff outside Illinois:

County and State
☐ Special process server
☐ Licensed private detective

FEES

Service and Return:	\$
Miles	\$
Total	\$ 0.00

Print Name

If *Summons* is served by licensed private detective or private detective agency:

License Number: _____

FILED DATE: 7/21/2023 3:27 PM 2023CH06224

This form is approved by the Illinois Supreme Court and must be accepted in all Illinois Courts. Forms are free at ilcourts.info/forms.

STATE OF ILLINOIS, CIRCUIT COURT Cook <input checked="" type="checkbox"/> COUNTY		ADDITIONAL DEFENDANT/RESPONDENT ADDRESS AND SERVICE INFORMATION FOR SUMMONS	<i>For Court Use Only</i>
Instructions Enter above the county name where the case was filed. Enter your name as Plaintiff/Petitioner. Below "Defendants/Respondents," enter the names of all people you are suing. Enter the Case Number given by the Circuit Clerk.		Plaintiff / Petitioner (First, middle, last name) Judy Holmquist v. Defendants / Respondents (First, middle, last name) Resilience Healthcare-West Suburban Medical Center, LLC, Resilience Healthcare-Weiss Memorial Hospital, LLC and AUM Global Healthcare Management, LLC dba Resilience Healthcare-WestLaw Management Company, LLC <input type="checkbox"/> Alias Summons (Check this box if this is not the 1 st Summons issued for this Defendant.)	
		2023CH06224 Case Number	

In 1a, enter the name and address of the next Defendant/Respondent you are serving. If you are serving a Registered Agent, include the Registered Agent's name and address here.

In 1b, enter a second address for this Defendant/Respondent if you have one.

In 1c, check how you are sending your documents to this Defendant/Respondent.

1. Next Defendant/Respondent's address and service information:

a. Defendant/Respondent's primary address/information for service:

Name (First, Middle, Last): AUM Global Healthcare Management, LLC

Registered Agent's name, if any: M. Kumar

Street Address, Unit #: 191 South Berkshire Road

City, State, ZIP: Bloomfield Hills, MI 48302

Telephone: _____ Email: _____

b. If you have more than one address where Defendant/Respondent might be found, list that here:

Name (First, Middle, Last): _____

Street Address, Unit #: _____

City, State, ZIP: _____

Telephone: _____ Email: _____


c. Method of service on Defendant/Respondent:

☐ Sheriff ☒ Sheriff outside Illinois: Oakland County Michigan
County & State

☐ Special process server

☐ Licensed private detective

FILED DATE: 7/21/2023 3:27 PM 2023CH06224

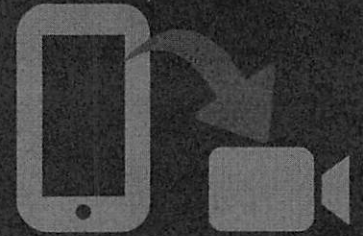
STATE OF ILLINOIS, CIRCUIT COURT		ADDITIONAL DEFENDANT/RESPONDENT ADDRESS AND SERVICE INFORMATION FOR SUMMONS		<i>For Court Use Only</i>
Cook  COUNTY				
Instructions	Plaintiff / Petitioner <i>(First, middle, last name)</i> <u>Judy Holmquist</u> v. Defendants / Respondents <i>(First, middle, last name)</i> <u>Resilience Healthcare-West Suburban Medical Center,</u> <u>LLC, Resilience Healthcare-Weiss Memorial Hospital, LLC</u> <u>and AUM Global Healthcare Management, LLC dba</u> <u>Resilience Healthcare-WestLaw Management Company, LLC</u> <input type="checkbox"/> Alias Summons <i>(Check this box if this is not the 1st</i> <i>Summons issued for this Defendant.)</i>			
Enter above the county name where the case was filed.				
Enter your name as Plaintiff/Petitioner.				
Below "Defendants/ Respondents," enter the names of all people you are suing.				
Enter the Case Number given by the Circuit Clerk.				<u>2023CH06224</u> Case Number

In 1c, check how you are sending your documents to this Defendant/ Respondent.

☐ Licensed private detective

ZOOM FROM YOUR PHONE

How to use Zoom on your smart phone
for your remote court hearing



FILED DATE: 7/21/2023 3:27 PM 2023CH0622

1

GO TO YOUR APP STORE

On iPhones, it is called the App Store. On Androids, it is called Google Play. If the court gave you a link, click the link and follow the instructions.



Google Play

2

DOWNLOAD THE ZOOM APP

Search for the Zoom Cloud Meetings app in the search bar and download the FREE app called "ZOOM Cloud Meetings."



ZOOM Cloud Meetings
Meet Happy
★★★★★ 985K



3

OPEN THE ZOOM APP

You can open the Zoom app immediately after downloading it by clicking the "Open" button in your App Store or you can open the Zoom app that is now on your phone.

OPEN



4

CLICK "JOIN A MEETING"

You do not need to "Sign Up" or "Sign In" to join a meeting.

Join a Meeting

5

TYPE YOUR INFORMATION AND CLICK "JOIN"

Type in the Meeting ID the court gives you in the box labeled A.
Type in your full name in the box labeled B.

Cancel Join a Meeting

Meeting ID **A**

Join with a personal link name

Screen Name **B**

Join

6

TYPE THE ZOOM MEETING PASSWORD

Type in the Zoom Meeting Password the court gives you in the box labeled C and click "Continue."

Please enter your meeting password

Password **C**

Cancel Continue

7

CLICK "JOIN WITH VIDEO"

You will be automatically asked to connect to video. If you are not asked, look for the camera symbol and click "Start Video."

Join with Video

8

CLICK "JOIN AUDIO" AND CHOOSE "CALL OVER INTERNET" OR "DIAL IN"

You will be automatically asked to connect to audio. If you are not asked, look for the headphones symbol, click "Join Audio," and select "Call Over Internet." "Dial in" requires the phone number the court gives you.

Join Audio Start Video Screen Name Participants More

To hear others please join audio

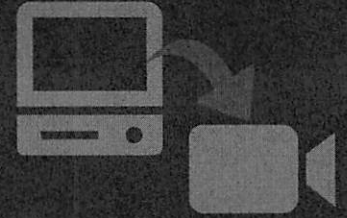
Call Over Internet

Dial In

Cancel

ZOOM FROM YOUR COMPUTER

How to use Zoom on your computer or laptop (with a webcam) for your remote court hearing



FILED DATE: 7/21/2023 3:27 PM 2023CH0622

1

GO TO zoom.us/join

If the court gave you a link, click the link and follow the instructions.



2

TYPE YOUR INFORMATION AND CLICK "JOIN"

Type in the Meeting ID the court gives you in the box labeled A and click "Join."

Join a Meeting

Meeting ID or Personal Link Name **(A)**

Join

3

CLICK "OPEN ZOOM MEETINGS"

If you don't have Zoom installed on your computer, click on "download and run Zoom" and open the .exe file to install Zoom.

Open Zoom Meetings?

<https://zoom.us> wants to open this application.

☐ Always allow zoom.us to open links of this type in the associated app.

Open Zoom Meetings Cancel

4

TYPE YOUR INFORMATION AND CLICK "JOIN"

Type in the Meeting ID the court gives you in the box labeled B. Type in your full name in the box labeled C.

Join Meeting

Meeting ID or Personal Link Name **(B)**

Your Name **(C)**

☐ Remember my name for future meetings

☐ Don't connect to audio

☐ Turn off my video

Cancel Join

5

TYPE THE ZOOM MEETING PASSWORD

Type in the Zoom Meeting Password the court gives you in the box labeled D and click "Join Meeting."

Enter meeting password **(D)**

Meeting password

Join Meeting Cancel

6

CLICK "JOIN WITH VIDEO"

You will see a video preview before you join with video. If you do not want to appear with video, click "Join without Video."

Join without Video Join with Video

7

CLICK "JOIN WITH COMPUTER AUDIO"

You can test your speaker and microphone by clicking the words under "Join with Computer Audio."

Choose ONE of the audio conference options

Phone Call Computer Audio

Join with Computer Audio

Test Speaker and Microphone

Getting Ready for Your Remote Hearing:

- Check your internet or phone connection.
- Charge your computer or phone. Make sure you have enough minutes.
- Use earbuds or headphones if you can. This makes it easier to hear you speak.
- Look for the microphone symbol to mute and un-mute yourself.
- Keep yourself on mute when your case is not before the judge.
- Use an empty, quiet space where no one will interrupt you and with no background noise.
- Set the camera at eye level. If using a phone, prop it up so your hands are free.
- Pause before speaking in case there is audio/video lag.
- Even if you are at home, remember that a remote hearing is still an official court hearing and you should dress and behave appropriately.

This form is approved by the Illinois Supreme Court and must be accepted in all Illinois Courts.

Forms are free at ilcourts.info/forms.

STATE OF ILLINOIS, CIRCUIT COURT <u>Cook</u> COUNTY		SUMMONS		<i>For Court Use Only</i> FILED 7/21/2023 3:27 PM IRIS Y. MARTINEZ CIRCUIT CLERK COOK COUNTY, IL 2023CH06224 Calendar, 15 23643204
Instructions ▼ Enter above the county name where the case was filed.	<u>Judy Holmquist</u> Plaintiff / Petitioner (First, middle, last name)			<u>2023CH06224</u> Case Number Hearing Date: No hearing scheduled Location: <<CourtRoomNumber>> Judge: Calendar, 15
Enter your name as Plaintiff/Petitioner.	v.			
Below "Defendants/ Respondents," enter the names of all people you are suing.	Defendants / Respondents (First, middle, last name) <u>Resilience Healthcare-West Suburban Medical Center,</u> <u>LLC, Resilience Healthcare-Weiss Memorial Hospital, LLC</u> <u>and AUM Global Healthcare Management, LLC dba</u> <u>Resilience Healthcare-WestLaw Management Company, LLC</u>			
Enter the Case Number given by the Circuit Clerk.	<input type="checkbox"/> Alias Summons (Check this box if this is not the 1 st Summons issued for this Defendant.)			

IMPORTANT: You have been sued.

- Read all documents attached to this Summons.
- You **MUST** file an official document with the court within the time stated on this Summons called an *Appearance* and a document called an *Answer/Response*. If you do not file an *Appearance* and *Answer/Response* on time, the judge may decide the case without hearing from you. This is called "default." As a result, you could lose the case.
- All documents referred to in this Summons can be found at ilcourts.info/forms. Other documents may be available from your local Circuit Court Clerk's office or website.
- After you fill out the necessary documents, you need to electronically file (e-file) them with the court. To e-file, you must create an account with an e-filing service provider. For more information, go to ilcourts.info/efiling. If you cannot e-file, you can get an exemption that allows you to file in-person or by mail.
- You may be charged filing fees, but if you cannot pay them, you can file an Application for Waiver of Court Fees.
- It is possible that the court will allow you to attend the first court date in this case in-person or remotely by video or phone. Contact the Circuit Court Clerk's office or visit the Court's website to find out whether this is possible and, if so, how to do this.
- Need help? Call or text Illinois Court Help at 833-411-1121 or go to ilcourthelp.gov for information about going to court, including how to fill out and file documents. You can also get free legal information and legal referrals at illinoislegalaid.org. All documents referred to in this Summons can be found at ilcourts.info/forms. Other documents may be available from your local Circuit Court Clerk's office or website.
- ¿Necesita ayuda? Llame o envíe un mensaje de texto a Illinois Court Help al 833-411-1121, o visite ilcourthelp.gov para obtener información sobre los casos de la corte y cómo completar y presentar formularios.

Plaintiff/Petitioner:**Do not use this form** in these types of cases:

- | | | |
|----------------------|------------------------------|-------------------------------|
| • All criminal cases | • Order of protection | • Adult guardianship |
| • Eviction | • Paternity | • Detinue |
| • Small Claims | • Stalking no contact orders | • Foreclosure |
| • Divorce | • Civil no contact orders | • Administrative review cases |

For eviction, small claims, divorce, and orders of protection, use the forms available at ilcourts.info/forms. If your case is a detinue, visit illinoislegalaid.org for help.

If you are suing more than 1 Defendant/Respondent, attach an *Additional Defendant/Respondent Address and Service Information* form for **each** additional Defendant/Respondent.

Check here if you are serving more than 1 Defendant/ Respondent. Attach an *Additional Defendant/ Respondent Address and Service Information* form for each additional Defendant/Respondent and write the number of forms you attached.

In 2a, enter the amount of money owed to you. Check 2b if you are asking for the return of tangible personal property.

In 3, enter your complete address, telephone number, and email address, if you have one.

a. Defendant/Respondent's primary address/information for service:
Name (First, Middle, Last): AUM Global Healthcare Management, LLC
Registered Agent's name, if any: M. Kumar
Street Address, Unit #: 191 S. Berkshire Road
City, State, ZIP: Bloomfields Hills, MI 48302
Telephone: _____ Email: _____

b. If you have more than one address where Defendant/Respondent might be found, list that here:
Name (First, Middle, Last): _____
Street Address, Unit #: _____
City, State, ZIP: _____
Telephone: _____ Email: _____

c. Method of service on Defendant/Respondent:
☐ Sheriff ☒ Sheriff outside Illinois: Oakland County Michigan
County & State
☐ Special process server ☐ Licensed private detective

I have attached 2 Additional Defendant/Respondent Address
Number
and Service Information forms.

a. Amount claimed: \$ 200,000.00

☐ b. I am asking for the return of tangible personal property (items in the Defendant/Respondent's possession).

Name (First, Middle, Last): Shaw Legal Services Ltd
Street Address, Unit #: 540 West Briar Place, Suite B
City, State, ZIP: Chicago, IL 60657
Telephone: (773) 549-9500 Email: administrator@shawattorneys.com

GETTING COURT DOCUMENTS BY EMAIL: You should use an email account that you do not share with anyone else and that you check every day. If you do not check your email every day, you may miss important information, notice of court dates, or documents from other parties.

**Important
information for the
person getting this
form**

You have been sued. Read all of the documents attached to this *Summons*.
To participate in the case, you must follow the instructions listed below. If you do not, the court may decide the case without hearing from you and you could lose the case. *Appearance* and *Answer/Response* forms can be found at: ilcourts.info/forms.

Check 4a or 4b. If Defendant/Respondent only needs to file an *Appearance* and *Answer/Response* within 30 days, check box 4a. Otherwise, if the clerk gives you a court date, check box 4b.

☐ a. To respond to this *Summons*, you must file *Appearance and Answer/Response* forms with the court within 30 days after you have been served (*not counting the day of service*) by e-filing or at:
Address: _____
City, State, ZIP: _____

In 4a, fill out the address of the court building where the Defendant may file or e-file their Appearance and Answer/ Response.

In 4b, fill out:

- The court date and time the clerk gave you.
- The courtroom and address of the court building.
- The call-in or video information for remote appearances (if applicable).
- The clerk's phone number and website. All of this information is available from the Circuit Clerk.

☒ b. Attend court:
On: 11/02/2023 at 10:00 ☒ a.m. ☐ p.m. in 2410
Date Time Courtroom

In-person at:

Courthouse Address City State ZIP

OR

Remotely (You may be able to attend this court date by phone or video conference.

This is called a "Remote Appearance"):

By telephone: 312-626-6799

Call-in number for telephone remote appearance

By video conference: <https://circuitcourtofcookcounty.zoom.us/j/95535573920>

Video conference website

Meeting ID: 95535573920 no password required

Video conference log-in information (meeting ID, password, etc.)

Call the Circuit Clerk at: (312) 603-5030 or visit their website

Circuit Clerk's phone number

at: <https://www.cookcountyclerkofcourt.org> to find out more about how to do this.

Website

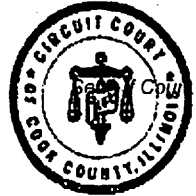
STOP!

The Circuit Clerk will fill in this section.

Witness this Date:

7/21/2023 3:27 PM IRIS Y. MARTINEZ

Clerk of the Court:



STOP! The officer or process server will fill in the Date of Service

Note to officer or process server:

- If 4a is checked, this *Summons* must be served within 30 days of the witness date.
- If 4b is checked, this *Summons* must be served at least 21 days before the court date, unless 2b is also checked.
 - If 4b and 2b are checked, the *Summons* must be served at least 3 days before the court date.

Date of Service:

(Date to be entered by an officer or process server on the copy of this Summons left with the Defendant or other person.)

**This form is approved by the Illinois Supreme Court and must be accepted in all Illinois Courts.
Forms are free at ilcourts.info/forms.**

****Stop. Do not complete the form. The sheriff or special process server will fill in the form. Give them one copy of this blank *Proof of Service* form for each Defendant/Respondent.****

City, State, ZIP: _____

☐ I was not able to serve the *Summons* and Complaint/Petition on Defendant/Respondent:

First, Middle, Last

I made the following attempts to serve the *Summons* and Complaint/Petition on the Defendant/Respondent:

1. On this date: _____ at this time: _____ ☐ a.m. ☐ p.m.
Address: _____
City, State, ZIP: _____
Other information about service attempt: _____

2. On this date: _____ at this time: _____ ☐ a.m. ☐ p.m.
Address: _____
City, State, ZIP: _____
Other information about service attempt: _____

3. On this date: _____ at this time: _____ ☐ a.m. ☐ p.m.
Address: _____
City, State, ZIP: _____
Other information about service attempt: _____

DO NOT complete this section. The sheriff or private process server will complete it.

If you are a special process server, sheriff outside Illinois, or licensed private detective, your signature certifies that everything on the *Proof of Service of Summons* is true and correct to the best of your knowledge. You understand that making a false statement on this form could be perjury.

Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony.

By:

Signature by: ☐ Sheriff
☐ Sheriff outside Illinois:

County and State
☐ Special process server
☐ Licensed private detective

FEES

Service and Return:	\$	_____
Miles	\$	_____
Total	\$	0.00

Print Name

If *Summons* is served by licensed private detective or private detective agency:

License Number: _____

This form is approved by the Illinois Supreme Court and must be accepted in all Illinois Courts. Forms are free at ilcourts.info/forms.

STATE OF ILLINOIS, CIRCUIT COURT Cook <input checked="" type="checkbox"/> COUNTY		ADDITIONAL DEFENDANT/RESPONDENT ADDRESS AND SERVICE INFORMATION FOR SUMMONS	<i>For Court Use Only</i>
Instructions Enter above the county name where the case was filed. Enter your name as Plaintiff/Petitioner. Below "Defendants/ Respondents," enter the names of all people you are suing. Enter the Case Number given by the Circuit Clerk.	Plaintiff / Petitioner (First, middle, last name) Judy Holmquist v. Defendants / Respondents (First, middle, last name) Resilience Healthcare-West Suburban Medical Center, LLC, Resilience Healthcare-Weiss Memorial Hospital, LLC and AUM Global Healthcare Management, LLC dba Resilience Healthcare-WestLaw Management Company, LLC <input type="checkbox"/> Alias Summons (Check this box if this is not the 1 st Summons issued for this Defendant.)		2023CH06224 Case Number

In 1a, enter the name and address of the next Defendant/ Respondent you are serving. If you are serving a Registered Agent, include the Registered Agent's name and address here.

In 1b, enter a second address for this Defendant/ Respondent if you have one.

In 1c, check how you are sending your documents to this Defendant/ Respondent.

1. Next Defendant/Respondent's address and service information:

a. Defendant/Respondent's primary address/information for service:

Name (First, Middle, Last): Resilience Healthcare-Weiss Memorial Hospital, LLC

Registered Agent's name, if any: Irene Dumanis

Street Address, Unit #: 4646 North Marine Drive

City, State, ZIP: Chicago, IL 60640

Telephone: _____ Email: _____

b. If you have more than one address where Defendant/Respondent might be found, list that here:

Name (First, Middle, Last): _____

Street Address, Unit #: _____

City, State, ZIP: _____

Telephone: _____ Email: _____

c. Method of service on Defendant/Respondent:


☒ Sheriff

☐ Sheriff outside Illinois:

County & State

☐ Special process server

☐ Licensed private detective

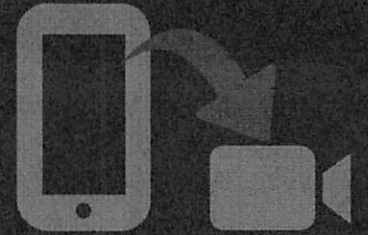
STATE OF ILLINOIS, CIRCUIT COURT Cook  COUNTY		ADDITIONAL DEFENDANT/RESPONDENT ADDRESS AND SERVICE INFORMATION FOR SUMMONS		<i>For Court Use Only</i>
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Meet Happy
★★★★★ 965K



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OPEN



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CLICK "JOIN A MEETING"

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Join a Meeting

5

TYPE YOUR INFORMATION AND CLICK "JOIN"

Type in the Meeting ID the court gives you in the box labeled A.
Type in your full name in the box labeled B.

Cancel Join a Meeting

Meeting ID **A**

Join with a personal link name

Screen Name **B**

Join

6

TYPE THE ZOOM MEETING PASSWORD

Type in the Zoom Meeting Password the court gives you in the box labeled C and click "Continue."

Please enter your meeting password

Password **C**

Cancel Continue

7

CLICK "JOIN WITH VIDEO"

You will be automatically asked to connect to video. If you are not asked, look for the camera symbol and click "Start Video."

Join with Video

8

CLICK "JOIN AUDIO" AND CHOOSE "CALL OVER INTERNET" OR "DIAL IN"

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Join Audio Start Video

To hear others please join audio

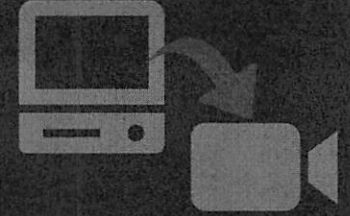
Call Over Internet

Dial In

Cancel

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Join a Meeting

Meeting ID or Personal Link Name **A**

Join

3

CLICK "OPEN ZOOM MEETINGS"

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<https://zoom.us> wants to open this application.

☐ Always allow zoom.us to open links of this type in the associated app.

Open Zoom Meetings Cancel

4

TYPE YOUR INFORMATION AND CLICK "JOIN"

Type in the Meeting ID the court gives you in the box labeled B. Type in your full name in the box labeled C.

Join Meeting

Meeting ID or Personal Link Name **B**

Your Name **C**

☐ Remember my name for future meetings

☐ Don't connect to audio

☐ Turn off my video

Cancel Join

5

TYPE THE ZOOM MEETING PASSWORD

Type in the Zoom Meeting Password the court gives you in the box labeled D and click "Join Meeting."

Enter meeting password **D**

Meeting password

Join Meeting Cancel

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Join without Video Join with Video

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- Pause before speaking in case there is audio/video lag.
- Even if you are at home, remember that a remote hearing is still an official court hearing and you should dress and behave appropriately.

ATTORNEY NO. 46837
IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

JUDY HOLMQUIST.,

Plaintiffs

v.

RESILIENCE HEALTHCARE – WEST
SUBURBAN MEDICAL CENTER, LLC
a Delaware limited liability
Company, RESILIENCE HEALTHCARE-
WEISS MEMORIAL
HOSPITAL, LLC, a Delaware limited
liability company,
AUM GLOBAL
HEALTHCARE MANAGEMENT, LLC
d/b/a Resilience Healthcare, WestLaw
Management Company, LLC, a Michigan
Limited Liability Company

2023CH06224
No.

COMPLAINT

The Plaintiff, Judy Holmquist, by and through their attorneys, Shaw Legal Services, Ltd., and for their Complaint against defendants, complains of Defendants RESILIENCE HEALTHCARE-WEST SUBURBAN MEDICAL CENTER, LLC (“West Suburban”), RESILIENCE HEALTHCARE -WEISS MEMORIAL HOSPITAL (“Weiss”), LLC, AUM GLOBAL HEALTHCARE MANAGEMENT, LLC d/b/a Resilience Healthcare, WestLaw Management Company, LLC (“AUM”) (Collectively referred to as “Defendants”) follows:

FACTS COMMON TO ALL COUNTS

1. At all times relevant Plaintiff was a resident of Cook County Illinois where some or all of the relevant events took place.



* 5 0 3 1 3 6 2 0 *

2. Defendant West Suburban is a Delaware company registered in Illinois as a foreign company having its principal place of business in Cook County, Illinois where all or some of the relevant events took place.

3. Defendant West Suburban is a Delaware company registered in Illinois as a foreign company having its principal place of business in Cook County, Illinois where all or some of the relevant events took place.

4. Defendant Weiss is a Delaware company registered in Illinois as a foreign company having its principal place of business in Cook County, Illinois where all or some of the relevant events took place.

5. Defendant AUM is a Michigan company registered in Illinois as a foreign company having its principal place of business in Cook County, Illinois where all or some of the relevant events took place.

6. Plaintiff was diagnosed with Small Lymphocytic Lymphoma/Chronic Leukemia (“Cancer”) in 2007 and receives monthly IVIG infusions.

7. From 2010 to 2022, Plaintiff Judy Holmquist was employed as the Laboratory Market Director for Defendant West Suburban and Defendant Weiss, which were part of Tenet Hospitals, then SRC Hospital Investments, LLC in affiliation with Pipeline Health System, LLC and as of June 2022 are now owned and managed by Defendant AUM.

8. As Laboratory Market Director, Plaintiff’s duties included supervising managers, procurement, compliance, preparing budgets, preparing the laboratories inspections and accreditation, and manuals for West Suburban and Weiss laboratories. (“Job Scope”).

9. Plaintiff consistently received exemplary reviews, bonuses and performed her job functions at or above employer expectations.



* 5 0 3 1 3 6 2 0 *

10. As part of Plaintiff's Cancer treatment plan, she received once a month IVIG infusions for immunity which started in 2019 after tests revealed that she was severely immunocompromised due to chemotherapy treatments.

11. In 2010, Plaintiff informed Defendants of her Cancer diagnosis, treatment, and that she required regular leave, one day per month, under the Family and Medical Leave Act of 1993 ("FMLA") to receive her chemotherapy treatments, scans, and physician visits.

12. In November 2019, Plaintiff made her immediate supervisor, Joseph Ottolino ("Ottolino") aware of her cancer diagnosis and that she was immunocompromised.

13. In or around December 2019, COVID spread rapidly throughout the world and eventually in Illinois, expert scientists and medical professionals categorized the disease as a deadly, global pandemic, with no cure or vaccine at the time.

14. Medical experts and scientists explained that sheltering in place and keeping at least 6 to 10 feet away from other people, was the only practical way to prevent contracting COVID-19, which could lead to death.

15. Given Plaintiff's Cancer and zero immune system caused by her cancer treatment, Plaintiff was especially susceptible to the effects of COVID-19.

16. Accordingly, in November 2019, Ottolino moved Plaintiff to the 8th floor away from the laboratory testing areas where other similarly situated employees worked, in order to reduce Plaintiff's risk of infection from various diseases including COVID-19.

17. In or around 2021, Defendants hired Mark Trznadel ("Mark") and Barbara Martin ("Barbara") who would replace Ottolino as Plaintiff's direct supervisors.



* 5 0 3 1 3 6 2 0 *

18. Plaintiff told both Martin and Trzandel that she had Cancer and required FMLA for her monthly IVIG infusions, scans and physician visits which were especially important considering COVID-19.

19. Plaintiff performed all her job duties while on oral chemotherapy and while on her once-a-month FMLA leave for Cancer treatment.

20. From February 2021 to her termination on May 5, 2022, each time Plaintiff attempted to seek leave for her Cancer, Martin and Trznadel would humiliate, undermine, verbally and physically harass, falsely accuse Plaintiff of wrongdoing, and belittle Plaintiff.

21. Moreover, Defendants moved only Plaintiff next to the COVID-19 laboratory testing area, despite Plaintiff's protests, reasonable medical advice to distance Plaintiff from this laboratory, and Martin's and Trznadel's specialized knowledge of Plaintiff's immunocompromised system.

22. Defendants knew that given Plaintiff's immunocompromised system, that she would likely contract COVID-19 and suffer serious health consequences.

23. Indeed, Plaintiff contracted COVID-19 shortly after being moved to the laboratory testing area, was hospitalized for several weeks, and nearly died. Plaintiff primarily worked at Defendant West Suburban near the laboratory testing centers on the 4th floor, which also is a patient care floor, of the building.

24. In November 2019, Plaintiff informed her supervisor Ottolino, of her Cancer, treatments needed, and the fact she is immunocompromised.

25. Considering reports of COVID-19 and Plaintiff's immunocompromised body, Ottolino moved Plaintiff away from the laboratory testing area to an office on the 8th floor of



* 5 0 3 1 3 6 2 0 *

Defendant West Suburban to minimize Plaintiff's risk of infection from various diseases including COVID-19.

26. In or around 2020, COVID took over the routine testing at Defendant West Suburban's laboratories.

27. In February 2021, Defendant hired Mark Trznadel ("Trznadel") who together with existing Defendants' employee Barbara Martin ("Martin"), became Plaintiff's direct supervisors.

28. Martin and Trznadel have a background as nurses and are familiar with Plaintiff's Cancer and immunocompromised status.

29. Plaintiff informed both Martin and Trznadel of her Cancer, treatment needs, that she is immunocompromised, and required FMLA for her monthly IVIG infusions, which was critical due to COVID-19.

30. Shortly after February 2021, Plaintiff began to experience severe workplace harassment.

31. From February 2021 through May 2022, Martin and Trznadel criticized Plaintiff each time she exercised her FMLA rights in order to receive her IVIG infusions.

32. Each time Plaintiff requested FMLA leave, Martin would role her eyes and say sarcastically, "well if you have to".

33. In or around September 2021, Trznadel told Plaintiff that Martin did not like employees getting sick and taking leave, that Martin would not fire Plaintiff, but would make Plaintiff's life "hell".

34. Martin and Trznadel placed unrealistic expectations on Plaintiff outside of her job scope.



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35. Plaintiff's Job Scope was limited to supervising managers, procurement, compliance, and manuals for Respondent's hospital laboratories.

36. Plaintiff's Job Scope did not include managing daily operations at Defendants' laboratories.

37. However, Trznadel reprimanded or assigned blame to Plaintiff for poor daily operations performance.

38. In or around May 2021, during a daily staff meeting with other employees present, Trznadel with a sarcastic tone publicly criticized Plaintiff taking time off for Cancer related issues.

39. At this May 2021 meeting, Trznadel also criticized Plaintiff in the same sarcastic tone for daily operations issues, which were again outside her scope of work.

40. In or around September 2021, Trznadel grabbed Plaintiff's arm while admonishing Plaintiff of alleged poor performance for tasks outside her job scope.

41. Trznadel's actions caused Plaintiff to cry, suffer emotional distress, and leave work early that day.

42. Plaintiff complained regularly to Defendants' human resources department about the constant bullying from Trznadel and Martin.

43. In October 2021, Trznadel suddenly informed Plaintiff that she must vacate her 8th floor office and move to an office right next to Defendant West Suburban's laboratory where technicians performed COVID-19 tests.

44. Trznadel required only Plaintiff to move next to the COVID-19 testing labs.

45. Plaintiff strongly protested the move due to her immunocompromised system.



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46. In fact, Plaintiff's colleagues including an infectious disease doctor, who worked at Defendant West Suburban and familiar with Plaintiff's Cancer, were shocked and appalled at Defendants' choice to move Plaintiff closer to the COVID-19 testing laboratory.

47. Defendants through Trznadel required Plaintiff to move despite her protests.

48. On December 17, 2021, Plaintiff contracted COVID-19 and became very ill.

49. On January 19, 2021, Plaintiff was hospitalized for COVID-19 Pneumonia and scans revealed that Plaintiff's chemotherapy stopped working.

50. Plaintiff was dying and began making funeral arrangements.

51. Facing death due to COVID-19, Plaintiff was emotionally distraught.

52. However, by January 25, 2021, Plaintiff had managed to survive COVID-19, but had lost 40 pounds in the process. Further, Plaintiff was very weak and could not walk up the 13 steps to her bedroom.

53. Plaintiff's doctors advised her to rest and get ready for a new chemotherapy ramp up on a drug named Venetoclax, which required another hospitalization due to large tumor burden.

54. During this time, Plaintiff constantly updated Trznadel on her health and progress.

55. On February 3, 2022, Plaintiff was admitted to the University of Chicago for the Venetoclax ramp up and still tested positive for COVID-19.

56. On February 13, 2022, the University of Chicago discharged Plaintiff after successfully completing the ramp up.

57. On February 17, 2022, Plaintiff's oncologist cleared Plaintiff to return to work the following week.



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58. On February 21, 2022, Plaintiff returned to work and arrived at her office at approximately 7:30 a.m.

59. Almost as soon as Plaintiff arrived, both Martin and Trznadel called Plaintiff into Martin's office.

60. Immediately, Martin began berating Plaintiff, claiming Plaintiff left her department "leadless" while on medical leave and that Plaintiff's department suffered from several employees quitting ("Staffing Issues").

61. In fact, unbeknownst to Plaintiff at the time, Staffing Issues were caused by Maryam Khanjari ("Khanjari") a manager who Martin and Trznadel elevated to Plaintiff's position while Plaintiff was away on medical leave.

62. From March 1, 2022 to May 4, 2022, Plaintiff worked to improve staffing problems that Khanjari caused, but that Martin and Trznadel blamed Plaintiff for.

63. During this time, Plaintiff continued to suffer similar false accusations, bullying, and humiliation from Martin and Trznadel based on Plaintiff's Cancer.

64. Plaintiff continued to complain to Defendants' human resources department about Martin's and Trznadel's harassment, but Defendants did nothing to stop the behavior.

65. In early April 2022, Plaintiff told her oncologist about the harassment and stress she faced at work and how Defendants did nothing about it. Plaintiff's doctor stated the added stress increased Plaintiff's risk of health problems associated with the cancer treatment.

66. In May 2022, Plaintiff received a treatment plan for her Cancer surgery and requested 8 weeks of intermittent FMLA to complete the plan.



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67. On May 4, 2022, Plaintiff and her doctor submitted to Defendants' human resources all required and supporting paperwork for Plaintiff's FMLA request to complete the 8-week cancer treatment plan, which included surgery.

68. Defendants' Human resources then submitted Plaintiff's FMLA request to Martin.

69. Also, during this time in May 2022, Plaintiff prepared for Defendants' Laboratory Accreditation, which was set to occur on May 4, 2022.

70. On May 4, 2022, due to Plaintiff performing her job duties well, Defendants' laboratories passed inspections and were successfully accredited.

71. On May 5, 2022, Martin called Plaintiff into her office and in a harsh tone questioned Plaintiff why she needed time off under FMLA.

72. Plaintiff explained that her doctor had prescribed an 8-week treatment plan and had filled out the paperwork authorizing FMLA.

73. Further, that Plaintiff's doctor advised Plaintiff may need some days off throughout the 8-week treatment plan, especially after the surgery.

74. Martin was visibly unsatisfied with Plaintiff's answer, informed Plaintiff that she was eliminating her position, and then gave Plaintiff two options: (1) a demotion to manager at nearly half of Plaintiff's current pay; or (2) to resign.

75. At this time, as a Director, Plaintiff earned a salary of \$147,230.00 per year plus paid time off, health benefits, bonuses, and retirement benefits.

76. A manager position was not substantially similar to Plaintiff's Director position and earned significantly less at approximately \$80,000.

77. Plaintiff was shocked and distressed at Martin's offer and requested time to think about it, to which Martin agreed.



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78. However, just four hours later, Martin emailed Plaintiff a severance agreement claiming that Plaintiff's director position had been eliminated and terminated Plaintiff's employment.

79. On July 25, 2022, Defendant West Suburban posted a new job position for Director of Laboratory Services, a job substantially similar to Plaintiff's director position and one which Plaintiff was well qualified for.

80. Sometime thereafter, upon Martin's own admission she offered a position possibly similar to Plaintiff's to another employee who had been recently discharged.

COUNT I: VIOLATION OF THE ILLINOIS HUMAN RIGHTS ACT
(775 ILCS CH 5/2-102)(DISABILITY DISCRIMINATION)

81. The allegations contained within paragraphs 1 through 80 are incorporated as if fully set forth herein as paragraph 81 of Count I.

82. Plaintiff is disabled because she has been diagnosed with Small Lymphocytic Lymphoma/Chronic Leukemia Cancer since 2007.

83. Plaintiff's Cancer is unrelated to her ability to perform the functions of the Job Scope Defendants hired her to perform.

84. As a direct and proximate result of Plaintiff's Cancer, Defendants took adverse job action against Plaintiff in the following ways:

- a. In September 2021, Trznadel grabbing Plaintiff's arm admonishing Plaintiff for alleged poor performance for tasks outside of her Job Scope;
- b. After complaining to human resources about Trznadel and Martin's harassment and bullying, requiring only Plaintiff to vacate her 8th floor office and move right next to Defendant West Suburban's COVID-19 laboratory;



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- c. On February 21, 2022, after surviving COVID-19 and returning to work, Martin berating and admonishing Plaintiff for Staffing Issues, which were outside Plaintiff's Job Scope;
- d. From March 1, 2022 to May 4, 2022, continuously admonishing Plaintiff for Staffing Issues, which again were outside Plaintiff's Job Scope; and
- e. On May 4, 2022, terminating Plaintiff and then offering her position to former employee who had been recently discharged.

85. Shortly after Defendants terminated Plaintiff, Defendants hired or assigned other individual(s) who did not have cancer to perform Plaintiff's Job Scope and duties.

86. In this respect, Defendant West Suburban elevated Khanjari to Plaintiff's position while Plaintiff was away on medical leave.

87. Upon information and belief Khanjari does not suffer from cancer.

88. Further, after terminating Plaintiff, Defendants offered a position likely similar to Plaintiff's position to a another individual who, upon information and belief, did not have a cancer diagnosis.

89. Accordingly, Plaintiff's cancer was a substantial and motivating factor in Defendant's decision to terminate Plaintiff because Defendant preferred employees without a cancer diagnosis.

90. Defendants would have retained Plaintiff if she did not have cancer.

91. Therefore, Defendants termination of Plaintiff constituted intentional disability discrimination in violation of the Act.

WHEREFORE, Plaintiff, Judy Holmquist, prays this honorable court enter judgment in her favor in an amount pursuant to 775 ILCS 5/2-102 against Defendants to be determined at



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trial, but no less than \$200,000 representing lost wages, benefits, and other compensation; interest pursuant to 775 ILCS 5/10-102(C); attorney's fees and costs, and any other relief this court finds just and equitable.

COUNT II: VIOLATION OF THE ILLINOIS HUMAN RIGHTS ACT (775 ILCS 5/6-101(A)(RETALIATORY DISCHARGE)

92. The allegations contained within paragraphs 1 through 80 are incorporated as if fully set forth herein as paragraph 92 of Count II.

a. FMLA Retaliation after February 2021

93. On February 2021, Plaintiff engaged in protected activity by exercising her FMLA rights in taking leave for her monthly Cancer treatment.

94. Defendants took several adverse employment actions against Plaintiff which include:

- i. From February 2021 through May 2022, Martin would roll her eyes at Plaintiff each time she requested FMLA leave for her Cancer treatments and say sarcastically, "well if you have to";
- ii. In or around May 2021, Trznadel would publicly humiliate Plaintiff by admonishing her in front of other employees for tasks which were outside her Job Scope;
- iii. In or around September 2021, Martin told Trznadel she did not like employees getting sick and taking leave, that Martin would not fire Plaintiff, but would make Plaintiff's life "hell";
- iv. In or around September 2021, Trznadel grabbed Plaintiff's arm while again admonishing Plaintiff of alleged poor performance for tasks outside her job scope; and



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- v. In or around October 2021 after Plaintiff complained to human resources about Trznadel and Martin's constant bullying, knowing of Plaintiff's Cancer and immunocompromised status, Trznadel forced Plaintiff to move her office next to the COVID-19 testing laboratory.

b. FMLA Retaliation after December 2021

95. On December 17, 2021, after Trznadel forced Plaintiff to work next to the COVID-19 testing laboratory, Plaintiff contracted COVID-19 and became very ill.
96. On or about December 17, 2021, Plaintiff requested and took FMLA leave due to serious health problems she faced due to COVID-19.
97. Plaintiff was on FMLA leave from December 17, 2021 to February 17, 2022 due to being hospitalized for COVID-19 as follows:
- i. On January 19, 2021, Plaintiff was hospitalized for COVID-19 Pneumonia, her chemotherapy stopped working, and Plaintiff was dying;
 - ii. On or around January 25, 2021, after surviving COVID-19, Plaintiff's doctors advised that Plaintiff required additional time to recuperate, so that she could begin a new round of chemotherapy to address a large tumor;
 - iii. On February 3, 2022, Plaintiff began her new round of chemotherapy and still tested positive for COVID-19; and
 - iv. On February 17, 2022, Plaintiff's oncologist cleared Plaintiff to return to work the following week.
98. Plaintiff advised Trznadel of her progress throughout her FMLA leave.
99. On February 21, 2022, when Plaintiff returned to work, Martin and Trznadel took several adverse employment actions because Plaintiff requested FMLA, which include:



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- i. On February 21, 2022, Martin berated Plaintiff for Staffing Issues, which were outside her Job Scope;
- ii. From March 1, 2022 to May 4, 2022,
 - a. Martin and Trznadel continued to criticize and berate Plaintiff for Staffing Issues, even though this was outside Plaintiff's Job Scope and Plaintiff improved staffing conditions;
 - b. Martin and Trznadel continued to make false accusations that Plaintiff failed to perform on tasks outside her Job Scope; and
 - c. Martin and Trznadel continued to bully and humiliate Plaintiff in front of other co-workers based on Plaintiff's need for FMLA due to her Cancer and COVID-19.

100. Plaintiff continued to complain to Defendants' human resources department about Martin's and Trznadel's harassment, but Defendants did nothing to stop the behavior.

101. Defendant had no legitimate reason to move Plaintiff closer to the COVID-19 testing laboratory knowing Plaintiff was immunocompromised, other than because Plaintiff exercised her rights under FMLA.

102. Defendants had no legitimate reason to discipline Plaintiff for tasks outside her job scope.

103. Instead, Defendants disciplined Plaintiff because she exercised her rights under FMLA.

104. Defendants further had no legitimate to bully and harass Plaintiff other than because she exercised her rights under FMLA

c. FMLA Retaliation after May 4, 2022



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105. On May 4, 2022, Plaintiff requested FMLA leave to complete an 8-week cancer treatment plan, which included surgery, prescribed by her doctor.

106. Defendants took several adverse employment actions against Plaintiff because she requested FMLA, which include the following occurrence at Plaintiff's May 5, 2022 meeting with Martin:

- a. Martin harshly questioned Plaintiff why she needed the 8-week intermittent FMLA despite Plaintiff having provided the appropriate paperwork from her doctor;
- b. Martin responding to Plaintiff's reason for her FMLA request that Plaintiff's job had been eliminated;
- c. Martin in an agitated state gave Plaintiff two choices, both of which amounted to adverse employment action:
 - i. a demotion to manager at nearly half of Plaintiff's current pay; or
 - ii. to resign;
- d. Martin falsely agreed to allow Plaintiff a reasonable time to think about the two "options", when just four hours later Martin issued Plaintiff a severance agreement;
- e. Defendant refusing to offer Plaintiff a similar job position for Director of Laboratory at Defendant West Suburban; and
- f. Defendant claiming the Market Director of Laboratory position had been eliminated when Defendant Weiss and Defendant West Suburban advertised for Laboratory Director positions just months after Plaintiff's termination.



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107. Defendants should not have and had no legitimate reason for harshly questioning Plaintiff on her reasons for exercising her rights under FMLA.

108. Instead, Defendants disciplined Plaintiff because she exercised her rights under FMLA.

109. Defendants had no legitimate reason to bully and harass Plaintiff other than because she exercised her rights under FMLA.

110. Defendant had no legitimate reason to refuse offering Plaintiff a similar job position for Director of Laboratory at Defendant West Suburban and Defendant Weiss other than because Plaintiff exercised her rights under FMLA.

WHEREFORE, Plaintiff, Judy Holmquist, prays this honorable court enter judgment in her favor in an amount pursuant to 775 ILCS 5/2-102 against Defendants to be determined at trial, but no less than \$200,000 representing lost wages, benefits, and other compensation; interest pursuant to 775 ILCS 5/10-102(C); attorney's fees and costs, and any other relief this court finds just and equitable.

RESPECTFULLY SUBMITTED,

/s/Caryn I. Shaw

Caryn I. Shaw
Shaw Legal Services, Ltd.
540 W. Briar, Ste B
Chicago, IL 60657
cshaw@shawattorneys.com

EXHIBIT B

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

JUDY HOLMQUIST, an individual

Plaintiff,

v.

Case No. 2023CH06224

**RESILIENCE HEALTHCARE – WEST
SUBURBAN MEDICAL CENTER, LLC a
Delaware limited liability Company,
RESILIENCE HEALTHCARE-WEISS
MEMORIAL HOSPITAL, LLC, a
Delaware limited liability Company, AUM
GLOBAL HEALTHCARE
MANAGEMENT, LLC d/b/a Resilience
Healthcare, WestLaw Management
Company, LLC, a Michigan Limited
Liability Company,**

Defendant(s).

DEFENDANTS' NOTICE TO STATE COURT OF FILING NOTICE OF REMOVAL

PLEASE TAKE NOTICE that, on September 1, 2023, Defendants Resilience Healthcare – West Suburban Medical Center, LLC, Resilience Healthcare – Weiss Memorial Hospital, LLC, and AUM Global Healthcare Management, LLC d/b/a Resilience Healthcare (improperly named as AUM Global Healthcare Management, LLC d/b/a Resilience Healthcare, WestLaw Management Company, LLC), by and through their attorneys, Littler Mendelson, P.C., filed their Notice of Removal with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division pursuant to 28 U.S.C. § 1367(a). A true and correct copy of the Notice of Removal is attached as Exhibit 1.

PLEASE TAKE FURTHER NOTICE that the filing of said Notice in Federal Court, together with the filing of a copy of said Notice with this Court, effects the removal of this action in accordance with 28 U.S.C. § 1446(d).

Dated: September 1, 2023

Respectfully submitted,

/s/ Colette L. Kopon

Colette L. Kopon, ARDC# 6318262
Littler Mendelson, P.C.
321 North Clark Street, Suite 1100
Chicago, IL 60654
Telephone: 312.372.5520
ckopon@littler.com

Ariel Clarke, ARDC# 6335703
Littler Mendelson, P.C.
2425 E Camelback Road, Suite 900
Phoenix, AZ 85016
Telephone: 602.474.3600
aclarke@littler.com

Counsel for Defendants

CERTIFICATE OF SERVICE

The undersigned, an attorney, states that on September 1, 2023, she caused a copy of the foregoing be electronically filed with the Court's electronic filing system, which sent notification of such filing to all parties on record and sent a copy via U.S. Mail and email:

Caryn I. Shaw
Shaw Legal Services, Ltd.
540 W. Briar, Ste B
Chicago, Illinois 60657
cshaw@shawattorneys.com

/s/ Colette L. Kopon
Colette L. Kopon

4867-3852-2746.1 / 119172-1000

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JUDY HOLMQUIST, an individual

Plaintiff,

v.

RESILIENCE HEALTHCARE – WEST
SUBURBAN MEDICAL CENTER, LLC a
Delaware limited liability Company,
RESILIENCE HEALTHCARE-WEISS
MEMORIAL HOSPITAL, LLC, a Delaware
limited liability Company, AUM GLOBAL
HEALTHCARE MANAGEMENT, LLC d/b/a
Resilience Healthcare, WestLaw Management
Company, LLC, a Michigan Limited Liability
Company,

Defendant(s).

Case No.

(Removed from the Circuit Court of Cook
County, Illinois, County Department,
Chancery Division – Case No. 2023CH06224)

NOTICE OF REMOVAL

Defendants Resilience Healthcare – West Suburban Medical Center, LLC (“West Suburban”), Resilience Healthcare – Weiss Memorial Hospital, LLC (“Weiss Memorial”), and AUM Global Healthcare Management, LLC d/b/a Resilience Healthcare (improperly named as AUM Global Healthcare Management, LLC d/b/a Resilience Healthcare, WestLaw Management Company, LLC) (collectively “Defendants”), hereby remove the above-captioned action, which is currently pending in the Circuit Court of Cook County, Illinois, County Department, Chancery Division, to the United States District Court for the Northern District of Illinois, Eastern Division. This removal is based upon supplemental jurisdiction under 28 U.S.C. § 1367(a). In support of their Notice of Removal, Defendants state the following:

I. THE FEDERAL AND STATE COURT ACTIONS

1. On May 5, 2023, Plaintiff Judy Holmquist (“Plaintiff”), filed a lawsuit in this Court, entitled *Judy Holmquist v. Resilience Healthcare – West Suburban Medical Center, LLC, et al.*, Case No. 23-cv-02867 (the “Federal Court Action”), alleging, *inter alia*, that Defendants violated the Family and Medical Leave Act of 1993 (“FMLA”) and Employee Retirement Income Security Act (“ERISA”) when Defendants allegedly terminated her for exercising her rights under the FMLA and ERISA.

2. On July 3, 2023, Plaintiff filed a lawsuit in the Circuit Court of Cook County, Illinois, County Department, Chancery Division, entitled *Judy Holmquist v. Resilience Healthcare – West Suburban Medical Center, LLC, et al.*, Case No. 2023CH06224 (the “State Court Action”), alleging claims of retaliatory discharge and disability discrimination in violation of the Illinois Human Rights Act (“IHRA”) against Defendants based upon the events leading up to and including her termination, all of which were alleged in the Federal Court Action.

3. West Suburban and Weiss Memorial Hospital were served with a copy of the Summons and Complaint in the State Court Action on August 2, 2023. On August 31, 2023, AUM Global agreed to accept service of the Summons and Complaint. In accordance with 28 U.S.C. § 1446(a), a true and correct copy of the Summons and Complaint served on West Suburban and Weiss Memorial Hospital are attached as **Exhibit A**. No other process, pleadings, or orders related to this Action have been served on Defendants.

4. This Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b), as it is filed within thirty (30) days of service upon West Suburban and Weiss Memorial.

II. JURISDICTION AND VENUE

5. Because the Circuit Court of Cook County, Illinois, County Department, Chancery Division lies in the Eastern Division of the Northern District of Illinois, this Court is the appropriate venue for removal. *See* 28 U.S.C. §§ 1441(a) and 1446(a).

6. Removal of the State Court Action to this Court is proper because this Court has supplemental jurisdiction over the claims in the State Court Action pursuant to 28 U.S.C. § 1367(a).

III. SUPPLEMENTAL JURISDICTION

7. This Court has federal question jurisdiction over the Federal Court Action currently before the Court, under 28 U.S.C. § 1331, which confers original jurisdiction on the federal district courts “of all civil actions arising under the Constitution, laws, or treatises of the United States.”

8. Pursuant to 28 U.S.C. § 1367(a), this Court has supplemental jurisdiction over Plaintiff’s IHRA claims alleged in the State Court Action because those claims are so related to her FMLA and ERISA claims in the Federal Court Action that they form part of the same case or controversy under Article III of the United States Constitution. *See* 28 U.S.C. § 1367(a). The critical inquiry in determining whether claims form part of the same case or controversy is whether they “derive from a common nucleus of operative facts.” *City of Chicago v. Int’l Coll. of Surgeons*, 522 U.S. 156, 164-65 (1997).

9. Plaintiff’s IHRA claims derive from a common nucleus of operative facts as her FMLA and ERISA claims because they are all founded on the same allegedly retaliatory conduct, allegedly committed by the same individuals, under the same alleged circumstances. *See, e.g., De v. City of Chicago*, 912 F. Supp. 2d 709, 732 (N.D. Ill. 2012) (concluding that the plaintiff’s state and federal claims formed part of the same case or controversy because his claims were founded

on the same conduct, committed by the same defendants, under the same conditions of employment).

10. The IHRA claims in the State Court Action provide virtually identical facts and allegations as the corresponding federal law claims, namely, FMLA and ERISA.

11. Because Plaintiff's IHRA claims "derive from a common nucleus of operative facts" and because this Court has original jurisdiction over Plaintiff's FMLA and ERISA claims, which are currently before this Court, it is similarly vested with supplemental jurisdiction over Plaintiff's State Court Action.

12. Plaintiff's use of identical factual allegations to support her Federal Court Action and State Court Action demonstrates an expectation that all of her claims will be considered in a single lawsuit. *See, e.g., Goodman v. Bd. of Trustees of Community College*, 511 F. Supp. 602, 605 (N.D. Ill. 1981).

IV. COMPLIANCE WITH PROCEDURAL REQUIREMENTS

13. In accordance with the requirements of 28 U.S.C. § 1446, which sets the deadline for filing a notice of removal to thirty (30) days after service of a Summons and Complaint, this Notice of Removal is timely filed as it is filed within 30 days of service of the Summons and Complaint on August 2, 2023.

14. A true and correct copy of this Notice of Removal has been forwarded for filing in the Circuit Court of Cook County. Attached as **Exhibit B** is a copy of the Notice to Clerk of Circuit Court of Cook County of the Filing of Notice of Removal, the original of which is being filed with the Clerk of the Circuit Court of Cook County as required by 28 U.S.C. § 1446(d).

15. Attached as **Exhibit C** is a true and correct copy of the Notice to Adverse Party of Filing of Notice of Removal, the original of which is being served on the following individuals, as

required by 28 U.S.C. § 1446(d) via U.S Mail and email: Caryn I. Shawn, Shaw Legal Services, Ltd., 540 W. Briar, Ste B, Chicago, Illinois 60657, cshaw@shawattorneys.com.

16. Defendants file this Notice of Removal solely to remove the State Court Action and do not waive, and specifically reserve, any and all defenses.

WHEREFORE, having fulfilled all statutory requirements, Defendants hereby remove Plaintiff's State Court Action from the Circuit Court of Cook County, County Department, Chancery Division to this Court and requests that the Court assume jurisdiction over Plaintiff's State Court Action.

Dated: September 1, 2023

Respectfully submitted,

/s/ Colette L. Kopon

Colette L. Kopon, ARDC# 6318262
Littler Mendelson, P.C.
321 North Clark Street, Suite 1100
Chicago, IL 60654
Telephone: 312.372.5520
ckopon@littler.com

Ariel Clarke, ARDC# 6335703
Littler Mendelson, P.C.
2425 E Camelback Road, Suite 900
Phoenix, AZ 85016
Telephone: 602.474.3600
aclarke@littler.com

Counsel for Defendants

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on September 1, 2023, she caused a copy of the foregoing to be electronically filed with the Clerk of the U.S. District Court, Northern District of Illinois, using the CM/ECF system, which sent notification via electronic mail of such filing to all attorneys of record and sent a copy via U.S. Mail and email:

Caryn I. Shaw
Shaw Legal Services, Ltd.
540 W. Briar, Ste B
Chicago, Illinois 60657
cshaw@shawattorneys.com

/s/ Colette L. Kopon

Colette L. Kopon

4874-1557-6186.1 / 119172-1000

EXHIBIT C

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

JUDY HOLMQUIST, an individual

Plaintiff,

v.

Case No. 2023CH06224

**RESILIENCE HEALTHCARE – WEST
SUBURBAN MEDICAL CENTER, LLC a
Delaware limited liability Company,
RESILIENCE HEALTHCARE-WEISS
MEMORIAL HOSPITAL, LLC, a
Delaware limited liability Company, AUM
GLOBAL HEALTHCARE
MANAGEMENT, LLC d/b/a Resilience
Healthcare, WestLaw Management
Company, LLC, a Michigan Limited
Liability Company,**

Defendant(s).

NOTICE TO ADVERSE PARTY OF FILING NOTICE OF REMOVAL

To: Caryn I. Shaw
Shaw Legal Services, Ltd.
540 W. Briar, Ste B
Chicago, Illinois 60657
cshaw@shawattorneys.com

PLEASE TAKE NOTICE that on September 1, 2023, Defendants Resilience Healthcare – West Suburban Medical Center, LLC, Resilience Healthcare – Weiss Memorial Hospital, LLC, and AUM Global Healthcare Management, LLC d/b/a Resilience Healthcare (improperly named as AUM Global Healthcare Management, LLC d/b/a Resilience Healthcare, WestLaw Management Company, LLC), by and through their attorneys, Littler Mendelson, P.C., filed a Notice of Removal with the Clerk of the United States District Court, Northern District of Illinois (Eastern Division) pursuant to 28 U.S.C. § 1367(a). This action is pending in the Circuit Court for Cook County, County Department, Chancery Division, as Case No. 2023CH06224. A copy of that

Complaint was filed with the Notice of Removal. Pursuant to 28 U.S.C. § 1446(d), a true and correct copy of the Notice of Removal is attached to this Notice and hereby served upon you.

Dated: September 1, 2023

Respectfully submitted,

/s/ Colette L. Kopon

Colette L. Kopon, ARDC# 6318262

Littler Mendelson, P.C.

321 North Clark Street, Suite 1100

Chicago, IL 60654

Telephone: 312.372.5520

ckopon@littler.com

Ariel Clarke, ARDC# 6335703

Littler Mendelson, P.C.

2425 E Camelback Road, Suite 900

Phoenix, AZ 85016

Telephone: 602.474.3600

aclarke@littler.com

Counsel for Defendants

CERTIFICATE OF SERVICE

The undersigned, an attorney, states that on September 1, 2023, she caused a copy of the foregoing be electronically filed with the Court's electronic filing system, which sent notification of such filing to all parties on record and sent a copy via U.S. Mail and email:

Caryn I. Shaw
Shaw Legal Services, Ltd.
540 W. Briar, Ste B
Chicago, Illinois 60657
cshaw@shawattorneys.com

/s/ Colette L. Kopon
Colette L. Kopon

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